



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Stanley Mozdzen
DOCKET NO.: 22-29417.001-R-1
PARCEL NO.: 32-10-201-024-0000

The parties of record before the Property Tax Appeal Board are Stanley Mozdzen, the appellant; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the Cook County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$ 5,726
IMPR.: \$30,852
TOTAL: \$36,578

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) challenging the assessment for the 2022 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a three-story multi-family dwelling of masonry construction with 6,648 square feet of living area. The dwelling was constructed in 1972. The property has a 15,268 square foot site. The subject is classified as a Class 2-11 property under the Cook County Real Property Assessment Classification Ordinance. The subject property located in Bloom Township, Cook County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant completed Section IV of the Residential Appeal petition indicating the subject property sold in June 2019 for \$267,000. The appeal petition revealed the subject property was advertised for sale in the open market for 60 days with a realtor and the parties to the transaction were unrelated. The appellant submitted a copy of the settlement statement as evidence of the subject's sale price. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the 2019 purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$39,563. The subject's assessment reflects a market value of \$395,630 or \$59.51 per square foot of living area including land when applying Cook County Real Property Assessment Classification Ordinance level of assessment for Class 2 property of 10%.

In support of its contention of the correct assessment, the board of review submitted information on two comparable sales¹ located along the same street as the subject and within the subject's neighborhood code. The comparables are of three-story multi-family dwelling of masonry construction that were built from 1974 and 1976. The dwellings contain 6,270 square feet of living area and are situated in sites that contain 14,797 or 15,120 square feet of land area. The comparables sold in May 2021 and January 2022 for prices ranging of \$324,990 and \$345,000 or \$51.83 and \$55.02 per square foot of living area including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the evidence supports a reduction in the subject's assessment.

The Board gave little weight to the subject's June 2019 sale price of \$267,000. The Board finds the sale is dated occurring over two years prior to subject's January 1, 2022, assessment date. The Board finds the subject's sale did not occur proximate in time in relation to the assessment date to be a credible indicator of market value.

The Board finds the best evidence of market value in the record to be the two comparable sales submitted by the board of review. These comparables were generally similar to the subject in location, design, age and dwelling size. These properties sold more proximate in time to the assessment date at issue than the subject's June 2019 sale. The comparables sold in May 2021 and January 2022 for prices of \$324,990 and \$345,000 or \$51.83 and \$55.02 per square foot of living area including land. The subject's assessment reflects a market value of \$395,630 or \$59.51 per square foot of living area including land, which is greater than the two comparable sales contained in this record. After considering any necessary adjustments to the comparables for differences when compared to the subject, the Board finds the subject estimated market value as reflected by its assessment is excessive. Based this analysis, the Property Tax Appeal Board finds a reduction in the subject's assessment is warranted.

¹ Board of review comparable #3 purportedly sold in November 2021 for \$1. The Board will not further consider this sale in its analyses as no explanation was provided regarding the transaction.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date:

May 21, 2024



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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