



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

APPELLANT: Tom Bulow  
DOCKET NO.: 13-35978.001-I-1 through 13-35978.004-I-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Tom Bulow, the appellant, by Deborah M. Petro, Attorney at Law in Chicago; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
13-35978.001-I-1	24-29-201-042-1003	2,779	11,251	\$14,030
13-35978.002-I-1	24-29-201-042-1004	2,779	18,484	\$21,263
13-35978.003-I-1	24-29-201-042-1005	2,779	11,251	\$14,030
13-35978.004-I-1	24-29-201-042-1007	2,779	39,379	\$42,158

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 2013 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 two-story industrial condominium building of masonry construction with 9,030 square feet of building area. The building was constructed in 1990. The property has a total of 48,508 square feet of land area. and is located in Alsip, Worth Township, Cook County. The subject is classified as a class 5-89 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$320,000 as of January 1, 2014.

The appellant's appeal was also labeled "Rollover" at the top of the appeal form.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$115,462. The subject's assessment reflects a market value of \$461,848 or \$51.15 per square foot of living area, including land, when applying the level of assessment for class 5 property under the Cook County Real Property Assessment Classification Ordinance of 25%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales that were located in Oak Lawn, Orland Park and Palos Hills. The comparables had sale dates ranging from June 2010 to July 2013 for prices ranging from \$815,000 to \$2,400,000.

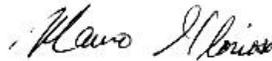
### **Conclusion of Law**

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 appellant met this burden of proof and a reduction in the subject's assessment is warranted.

As an initial matter regarding the appellant's request to have a "rollover" of the Board's 2012 decision, the record disclosed the Property Tax Appeal Board issued a decision reducing the subject's 2012 assessment. However, the Board finds that the subject property is not a residential property, which is one of the requirements for a "rollover" to occur. For this reason, the Property Tax Appeal Board finds that a reduction in the subject's assessment is not warranted because the subject of the appeal is not entitled to the "rollover" provision provided by section 16-185 of the Property Tax Code (35 ILCS 200/16-185).

The Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$320,000 as of January 1, 2014. The appraisal relied mostly on four sales of similar buildings located in Alsip, like the subject. In addition, the sales occurred from 2012 to 2014, which are proximate in time to the January 1, 2013 assessment date at issue. The subject's assessment reflects a market value of \$461,848, which is above the appraised value. The Board gave less weight to the comparable sales submitted by the board of review. The Board finds the properties are not located in Alsip, like the subject. Furthermore, three of the sales occurred in 2010 and 2011, which the Board finds are less probative of the subject's real estate market as of the assessment date at issue. Finally, the Board finds the sale prices for the suggested comparables, which range from \$815,000 to \$2,400,000, far exceed the subject's market value as established by the board of review's assessment. Based on this evidence the Board finds a reduction in the subject's assessment is justified.

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: February 13, 2019



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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