



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

APPELLANT: Hollywood Park
DOCKET NO.: 07-28508.001-C-1 through 07-28508.034-C-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Hollywood Park, the appellant, by attorney Brian P. Liston of Law Offices of Liston & Tsantilis, P.C., in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented, 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
07-28508.001-C-1	30-30-304-005-0000	19,575	0	\$19,575
07-28508.002-C-1	30-30-304-015-0000	5,240	0	\$5,240
07-28508.003-C-1	30-30-304-016-0000	1,492	0	\$1,492
07-28508.004-C-1	30-30-122-014-0000	441	0	\$441
07-28508.005-C-1	30-30-122-015-0000	441	0	\$441
07-28508.006-C-1	30-30-122-016-0000	441	0	\$441
07-28508.007-C-1	30-30-122-017-0000	441	0	\$441
07-28508.008-C-1	30-30-122-018-0000	441	0	\$441
07-28508.009-C-1	30-30-122-019-0000	441	0	\$441
07-28508.010-C-1	30-30-122-020-0000	383	0	\$383
07-28508.011-C-1	30-30-122-021-0000	383	0	\$383
07-28508.012-C-1	30-30-122-022-0000	383	0	\$383
07-28508.013-C-1	30-30-122-023-0000	441	0	\$441
07-28508.014-C-1	30-30-122-024-0000	441	0	\$441
07-28508.015-C-1	30-30-122-025-0000	441	0	\$441
07-28508.016-C-1	30-30-122-026-0000	441	0	\$441
07-28508.017-C-1	30-30-122-027-0000	441	0	\$441
07-28508.018-C-1	30-30-122-028-0000	441	0	\$441
07-28508.019-C-1	30-30-122-029-0000	441	0	\$441
07-28508.020-C-1	30-30-122-030-0000	441	0	\$441
07-28508.021-C-1	30-30-122-031-0000	441	0	\$441
07-28508.022-C-1	30-30-122-032-0000	441	0	\$441
07-28508.023-C-1	30-30-122-033-0000	441	0	\$441

07-28508.024-C-1	30-30-122-034-0000	441	0	\$441
07-28508.025-C-1	30-30-122-035-0000	441	0	\$441
07-28508.026-C-1	30-30-122-036-0000	441	0	\$441
07-28508.027-C-1	30-30-122-037-0000	441	0	\$441
07-28508.028-C-1	30-30-122-038-0000	441	0	\$441
07-28508.029-C-1	30-30-122-039-0000	441	0	\$441
07-28508.030-C-1	30-30-122-040-0000	441	0	\$441
07-28508.031-C-1	30-30-122-041-0000	441	0	\$441
07-28508.032-C-1	30-30-122-042-0000	441	0	\$441
07-28508.033-C-1	30-30-122-043-0000	441	0	\$441
07-28508.034-C-1	30-30-122-044-0000	441	0	\$441

Subject only to the State multiplier as applicable.

ANALYSIS

The subject property is a shuttered amusement park consisting of 70,583 square feet of land. A portion of the property was the subject of an eminent domain proceeding, after which the park closed. The improvements were demolished in stages, with one structure remaining as of July 2007. The property is located in Lansing, Hollywood Park Township, Cook County, Illinois.

The appellant submitted evidence before the Property Tax Appeal Board claiming unequal treatment in the assessment process and incorrect classification of the improvements. In support of these arguments, the appellant submitted descriptions and assessment information on seven land comparables. The comparables are located in Lansing, with one comparable located on the same street as the subject. The comparable lots range in size from 44,687 to 347,042 square feet of land area and have land assessments ranging from \$29,493 to \$89,238 or from \$0.22 to \$0.77 per square foot of land area. In addition, the appellant submitted three land sales which sold from September 2005 to November 2006 for prices ranging from \$27,900 to \$350,000 or from \$2.47 to \$3.46 per square foot of land area. The appellant submitted a copy of the decision issued by the board of review establishing a total assessment of \$272,371. The appellant also indicated the subject had a land assessment of \$214,500 or \$3.01 per square foot of land area.

Regarding the improvement assessments, the appellant disclosed the amusement park buildings were demolished in stages, with only one building still existing as of July 2007. The appellant contends that the structures existing during the 2007 assessment year were vacant and unlikely to have any market value other than amusement park purposes. Based on this evidence the appellant requested the subject's land assessment be reduced and the subject's improvement assessments be removed.

The board of review did not submit its "Board of Review Notes on Appeal" or any evidence in support of its assessed valuation of the subject property.

After reviewing the record and considering the evidence, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal. The Board further finds the evidence in the record supports a reduction in the subject's assessment.

The appellant contends assessment inequity as the basis of the appeal. Taxpayers who object to an assessment on the basis of lack of uniformity bear the burden of proving the disparity of assessments by clear and convincing evidence. Kankakee County Board of Review v. Property Tax Appeal Board, 131 Ill.2d 1 (1989). The evidence must demonstrate a consistent pattern of assessment inequities within the assessment jurisdiction. After an analysis of the assessment data the Board finds a reduction is warranted.

The appellant in this appeal submitted assessment information on seven assessment comparables to demonstrate the subject's land was inequitably assessed. The comparables have land assessments ranging from \$29,493 to \$89,238 or from \$0.22 to \$0.77 per square foot of land area. The subject has a land assessment of \$3.01 per square foot, which is above the range established by the comparables. Based on this record the Property Tax Appeal Board finds a reduction in the subject's land assessment is warranted.

As to the improvement assessments, the Board finds the appellant's claim, that the amusement park improvements were demolished and had no market value in 2007, to be persuasive. Furthermore, the board of review did not submit any evidence in support of its assessment of the subject property or to refute the appellant's argument as required by section 1910.40(a) of the rules of the Property Tax Appeal Board and is found to be in default pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. Based on this record the Property Tax Appeal Board finds the subject's improvement assessment should be voided.

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.

Ronald R. Cuit

Chairman

Frank J. Huff

Member

Member

Shawn R. Lerbis

Member

Member

Mario M. Louie

DISSENTING:

C E R T I F I C A T I O N

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: September 23, 2011

Allen Castrovillari

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 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 the subsequent year 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.

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.