



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

APPELLANT: First American Bank  
DOCKET NO.: 08-28013.001-C-1  
PARCEL NO.: 27-03-300-020-0000

The parties of record before the Property Tax Appeal Board are First American Bank, the appellant(s); of Crane & Norcross in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds no change 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:** \$169,730  
**IMPR.:** \$159,709  
**TOTAL:** \$329,439

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property consists of a 42,539 square foot parcel of land improved with a one-year old, two-story, commercial, bank building. The appellant, via counsel, argued that there was unequal treatment in the assessment process of the improvement as the bases of this appeal.

In support of the equity argument, the appellant submitted assessment data and descriptions on three properties suggested as comparable and located within the subject's township. The properties are described as one-story, masonry, commercial, bank buildings with various amenities. The properties range: in age from 4 to 19 years; in size from 3,040 to 4,035 square feet of building area; and in improvement assessment from \$36.77 to \$62.94 per square foot of building area.

In addition, the appellant lists the subject's improvement size as containing 3,520 square feet of building area. However, the appellant also submitted the property record card for the subject which lists the subject's size as 4,520 square feet of building area. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted "Board of Review-Notes on Appeal" where the subject's improvement assessment of \$159,709 was disclosed. The board listed the subject's size as containing 4,520 square feet of building area. The property record card indicating this was also submitted by the board of review.

In support of the assessment, the board submitted copies of the property record card for the subject as well as raw sales data on five properties. These properties sold for prices ranging from \$1,209,000 to \$5,100,000 or from \$251.88 to \$894.74 per square of building area. The board of review also included a copy of the warranty deed showing the subject sold in October 2005 for \$1,400,000. Based on this evidence, the board of review requested confirmation of the subject's assessment.

After considering the evidence and reviewing the testimony, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal.

The PTAB first finds that the best evidence of the subject's size is the property record card submitted by both parties. Therefore, the PTAB finds the subject contains 4,520 square feet of building area and has an improvement assessment of \$35.33 per square foot of building area.

Appellants who object to an assessment on the basis of lack of uniformity bear the burden of proving the disparity of assessment valuations by clear and convincing evidence. Kankakee County Board of Review v. Property Tax Appeal Board, 131 Ill. 2d 1, 544 N.E.2d 762 (1989). The evidence must demonstrate a consistent pattern of assessment inequities within the assessment jurisdiction. Proof of assessment inequity should include assessment data and documentation establishing the physical, locational, and jurisdictional similarities of the suggested comparables to the subject property. Property Tax Appeal Board Rule 1910.65(b). Mathematical equality in the assessment process is not required. A practical uniformity, rather than an absolute one is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395, 169 N.E.2d 769 (1960). Having

considered the evidence presented, the PTAB concludes that the appellant has not met this burden and that a reduction is not warranted.

The appellant presented assessment data on a total of three properties. The PTAB finds these comparables similar to the subject. These properties range: in age from 4 to 19 years; in size from 3,040 to 4,035 square feet of building area; and in improvement assessment from \$36.77 to \$62.94 per square foot of building area. In comparison, the subject's improvement assessment of \$35.33 per square foot of building area is below the range of these comparables. Therefore, after considering adjustments and the differences in both parties' comparables when compared to the subject, the PTAB finds the subject's per square foot improvement assessment is supported and a reduction in the improvement assessment is not warranted.

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.



Chairman



Member



Member



Member



Member

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: February 21, 2014



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.