FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: William Conner
DOCKET NO.: 09-20944.001-R-1
PARCEL NO.: 16-06-314-018-0000

The parties of record before the Property Tax Appeal Board are William Conner, the appellant, by attorney Joel R. Monarch 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:	$ 5,312
IMPR.:	$ 54,250
TOTAL:	$ 59,562

Subject only to the State multiplier as applicable.

ANALYSIS

The subject property is improved with a two-story dwelling of frame construction. The dwelling is 105 years old and contains 2,301 square feet of living area with a full unfinished basement and central air conditioning. The subject property is classified as a class 2-06 residential property under the Cook County Real Property Assessment Classification Ordinance and is located in Oak Park, Oak Park Township, Cook County.[1]

The appellant's appeal is based on unequal treatment in the assessment process. The appellant submitted information on four suggested comparable properties described as two-story dwellings of frame or stucco construction. The comparable properties have the same assigned neighborhood code as the subject and are classified as class 2-05 residential property.[2] The comparable dwellings are from 76 to 115 years old and contain from 2,112 to 2,176 square feet of living area. Each comparable has a garage and a full basement, one of which is finished; two comparables have a fireplace; and one has central air conditioning. The comparables have improvement assessments ranging from $40,873 to $45,412 or from $19.35 to $20.98 per square foot of living area.

[1] Class 2-06 is a two or more story residence, over 62 years, 2,201 to 4,999 square feet.
[2] Class 2-05 is a two or more story residence, over 62 years, up to 2,200 square feet.

The subject's improvement assessment is $54,250 or $23.58 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to $46,897 or $20.38 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's final assessment of $59,562 was disclosed. The board of review presented descriptions and assessment information on four suggested comparable properties consisting of two-story dwellings of frame construction. The comparable properties have the same assigned neighborhood and classification codes as the subject. The dwellings are from 100 to 120 years old and contain from 2,211 to 2,422 square feet of living area. Each comparable has a full unfinished basement; three comparables have garages; two comparables have central air conditioning; and another comparable has two fireplaces. These properties have improvement assessments ranging from $51,226 to $55,877 or from $22.19 to $24.45 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 a reduction in the subject's assessment is not warranted.

The appellant contends unequal treatment in the subject's improvement assessment 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 assessment valuations by clear and convincing evidence. Kankakee County Board of Review v. Property Tax Appeal Board, 131 Ill.2d 1 (1989). After an analysis of the assessment data, the Board finds the appellant has not met this burden.

Both parties presented assessment data on eight suggested comparables that were very similar to the subject in location, design, and foundation. In addition, seven of the comparables were very similar to the subject in age and exterior construction. Despite these similarities, the Board finds the appellant’s comparables were somewhat smaller than the subject. The comparables submitted by the board of review were most similar to the subject in size. Due to their similarities to the subject, these comparables submitted by the board of review received the most weight in the Board’s analysis. These comparables had improvement assessments that ranged from $51,226 to $55,877 or from $22.19 to $24.45 per square foot of living area. The subject's improvement assessment of $54,250 or $23.58 per square foot of living area falls within the range established by the most similar comparables. After considering adjustments and the differences in both parties' comparables when compared to the subject, the Board finds the subject's improvement assessment is equitable and a reduction in the subject's 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: August 23, 2013

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.