



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

APPELLANT: Lawrence Olson
DOCKET NO.: 10-21277.001-R-1
PARCEL NO.: 28-09-301-005-0000

The parties of record before the Property Tax Appeal Board are Lawrence Olson, the appellant, by attorney Julie Realmuto of McCarthy Duffy 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: \$5,290
IMPR.: \$15,075
TOTAL: \$20,365**

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2010 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 dwelling of frame construction with 1,848 square feet of living area. The dwelling is approximately 95 years old. Features of the home include a full unfinished basement and a two-car garage. The

property has a 105,807 square foot site and is located in Oak Forest, Bremen Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables. These comparables have improvement assessments ranging from \$7.12 to \$8.88 per square foot of living area. According to the appellant, the subject's improvement assessment is \$21,055 or \$11.39 per square foot of living area. However, the appellant is using the subject's improvement assessment for the 2009 tax year. The subject's 2010 improvement assessment is actually \$15,075 or \$8.16 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$14,802 or \$8.01 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the 2010 total assessment for the subject of \$20,365. The subject property has an improvement assessment of \$15,075 or \$8.16 per square foot of living area. The board of review did not submit any equity comparables.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

In this appeal, the appellant claims that the subject has an improvement assessment of \$11.39 per square foot of living area. However, that claim is based upon the subject's 2009 assessment figures. For 2010, the subject has an improvement assessment of \$8.16 per square foot of living area. The appellant presented assessment data on a total of three equity comparables. The board of review did not present any equity comparables. The

appellant's comparables have improvement assessments that range from \$7.12 to \$8.88 per square foot of living area. The Board finds that the subject's 2010 improvement assessment of \$8.16 per square foot of living area falls within this range. After considering adjustments and the differences in the appellant's comparables when compared to the subject, the Board finds the subject's per square foot 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: June 20, 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.