



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

APPELLANT: Palos Bank & Trust No. 1-3722
DOCKET NO.: 10-21448.001-R-1 through 10-21448.008-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Palos Bank & Trust No. 1-3722, the appellant, by attorney Patrick J. O'Malley, Palos Park, 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
10-21448.001-R-1	28-30-105-015-0000	468	0	\$468
10-21448.002-R-1	28-30-105-016-0000	468	0	\$468
10-21448.003-R-1	28-30-105-017-0000	468	0	\$468
10-21448.004-R-1	28-30-105-018-0000	468	0	\$468
10-21448.005-R-1	28-30-109-017-0000	468	0	\$468
10-21448.006-R-1	28-30-109-023-0000	1,072	0	\$1,072
10-21448.007-R-1	28-30-109-024-0000	453	0	\$453
10-21448.008-R-1	28-30-109-032-0000	384	0	\$384

Subject only to the State multiplier as applicable.

ANALYSIS

The subject appeal consists of eight vacant contiguous lots that range in size from 15,376 to 42,863 square feet of land area. The subject properties are located in Bremen Township, Cook County, Illinois.

The appellant contends the land assessments for five of the eight parcels are inequitable. In support of this argument, the appellant submitted assessment information for the eight subject parcels and three additional assessment comparables. The first three subject parcels have land assessments of \$468 or \$.025 per square foot of land area. The next five subject parcels have land assessments ranging from \$768 to \$2,143 or \$.050 per square foot of land area. The three additional land comparables, which

are vacant or used for water detention, range in size from 23,261 to 44,039 square feet of land area. They have land assessments of \$1 or \$899 or \$.000 and .024 per square foot of land area. The appellant argued the subject parcels are not uniform with one another or the similarly situated land comparables. The appellant also submitted a copy of the decision issued by the board of review establishing the land assessments for the subject parcels. Based on this evidence the appellant requested five of the eight subject parcels' land assessments be reduced.

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 as required by section 1910.40(a) of the rules of the Property Tax Appeal Board.

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 evidence, the Board finds a reduction is warranted.

The appellant in this appeal submitted information to demonstrate that five of the eight subject parcels were inequitably assessed. 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 was found to be in default pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. The Board has examined the evidence submitted by the appellant and finds that it supports a reduction in the assessed valuation for the five subject parcels under contention.

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.