



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

APPELLANT: 1157 LLC
DOCKET NO.: 09-32494.001-R-1
PARCEL NO.: 17-20-313-020-0000

The parties of record before the Property Tax Appeal Board are 1157 LLC, the appellant, by attorney Brian P. Liston of the 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 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: \$7,142
IMPR.: \$41,973
TOTAL: \$49,115

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 2009 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 two multi-family improvements situated on one parcel. Both improvements are three-story masonry dwellings that are 131 years old. Dwelling #1 has 4,881 square feet of living area, six apartment units and a full unfinished basement. Dwelling #2 has 3,240 square feet of living area, three apartment units, a concrete slab foundation and a two-car garage. The subject property has a 2,976 square foot site and is located in Chicago, West Chicago Township, Cook County. Under the Cook County Real Property Assessment

Classification Ordinance, both dwellings are classified as class 2-11 properties.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted five comparable sales for dwelling #1. The appellant did not fully complete the grid analysis in section V of the residential appeal form. The comparable sales for dwelling #1 are multi-family dwellings and have from three to six apartment units. The comparables sold from February 2007 to March 2009 for prices that ranged from \$32,000 to \$400,000 or from \$10,666 to \$110,000 per unit value. The appellant did not present any comparable sales for dwelling #2.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,115 (\$7,142 for land, \$22,306 for dwelling #1, and \$19,667 for dwelling #2). The subject's total assessment of \$49,115 reflects a market value of \$491,150 using the 10% ordinance level of assessment for Class 2 residential property in Cook County. The subject's total assessment equates to \$54,472 per apartment unit. In support of its contention of the correct assessment, the board of review submitted information on four comparables for each dwelling to demonstrate the subject's dwellings were equitably assessed.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the only evidence of market value was submitted by the appellant. The appellant submitted five comparable sales for the subject's dwelling #1. The Board finds the comparables submitted for dwelling #1 sold from February 2007 to March 2009 for prices that ranged from \$32,000 to \$400,000 or from \$10,666 to \$110,000 per apartment unit. The subject's assessment reflects a market value of \$491,150 or \$54,472 per apartment unit that is supported by the only sales in the record. The

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Board finds the evidence in the record does not support a reduction in the subject's assessment.

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: April 24, 2015



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.