



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

APPELLANT: Divya Sundaram
DOCKET NO.: 10-33554.001-R-1
PARCEL NO.: 02-20-205-002-0000

The parties of record before the Property Tax Appeal Board are Divya Sundaram, the appellant, by attorney Stephanie Park of Park & Longstreet, P.C. in Rolling Meadows; 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: \$8,697
IMPR.: \$69,270
TOTAL: \$77,967

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 with approximately 4,274¹ square feet of living area of frame and masonry construction. The dwelling was constructed in 1999. Features of the home include a full basement finished with a recreation room, central air conditioning, two fireplaces and a 3-car attached garage². The property has a 49,702 square foot site and is located in Inverness, Palatine Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$700,000 as of July 22, 2010

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$77,967. The subject's assessment reflects a market value of \$779,670 or \$182.42 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparables. Three of which sold from January 2009 to November 2009 for prices ranging from \$980,000 to \$1,449,129 or from \$225.91 to \$299.47 per square foot of living area including land.

The appellant's attorney submitted a rebuttal brief in response to the board of review's evidence contending the evidence should be given no weight because the sales were unadjusted.

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

¹ Board of review indicates 4,268 square feet of living area.

² Board of review data indicates a 3.5 car garage

burden of proof and a reduction in the subject's assessment is not warranted.

The Board gives the appraisal value little weight due to the fact the three sales provided by the appraiser had prices ranging from \$190.17 to \$234.71 per square foot of living area and adjusted prices ranging from \$184.73 to \$212.98 per square foot of living area. Nevertheless, the appraiser arrived at a value estimated of \$700,000 or \$163.78 per square foot of living area, significantly below the range of the sales. The Board finds this is not a credible estimate of market value for ad valorem tax purposes. The Board also finds problematic that the appraiser's estimate of value under the cost approach of \$874,398 is 25% above the estimated value under the sales comparison approach, which further detracts from the credibility of the report. The Board finds the raw sales in this record support the subject's assessment and a reduction is not justified.

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: May 22, 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.