



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

APPELLANT: Susan Sebok
DOCKET NO.: 11-23763.001-R-1
PARCEL NO.: 23-30-202-002-0000

The parties of record before the Property Tax Appeal Board are Susan Sebok, the appellant, by attorney Christopher G. Walsh, Jr. in Chicago, 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:

LAND: \$20,496
IMPR.: \$96,839
TOTAL: \$117,335

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 2011 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 one-story dwelling of masonry construction. The dwelling is approximately four years old and has 3,600 square feet of living area. Features of the home include a full finished basement,¹ central air conditioning, a fireplace and a three-car garage. The property has a 91,094 square foot site and is located in Palos Park, Palos Township, Cook County. The property is a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

¹ While the assessing officials reported an unfinished basement for the subject, the appellant's appraiser reported an 80% finished basement.

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 \$800,000 as of January 1, 2011.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$146,778. The subject's assessment reflects a market value of \$1,467,780 or \$407.72 per square foot of living area, including land, when applying the 10% level of assessment for class 2 residential properties under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment, the board of review submitted three comparable sales that sold from May 2010 to July 2011 for prices that ranged from \$420,000 to \$540,000 or from \$135.22 to \$184.43 per square foot of living area, land included.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the board of review submitted three comparable sales that sold for prices that were considerably lower than the subject's market value and were not located in the same neighborhood as the subject. The board of review comparables sold for prices that ranged from \$135.22 to \$184.43 per square foot of living area, land included. The Board gave the board of review's market evidence no weight.

The Board has analyzed the appraisal report as well as the comparables used in the appraisal presented by the appellant and gives little weight to the appraiser's conclusion of value. The appraiser analyzed six comparable sales that sold from April 2010 to March 2012 for prices that ranged from \$720,000 to \$1,600,000 or from \$161.98 to \$325.93 per square foot of living area. The appraiser made numerous adjustments to the comparables' sale prices for differences in living area, land

area, basement finish, and outdoor amenities. The comparables received from six to nine adjustments apiece, and, as gross adjustments, they ranged from 19% to 36% of the original sale prices. The Board finds these adjustments to be substantial and reflective of the fact that many of the comparables differed significantly from the subject. As a result, the Board has instead examined the raw sales used in the appraisal.

The Board finds the best evidence of market value in the record to be the appraiser's comparable #2. After analyzing the comparable sales utilized in the appraisal, the Board finds that comparable #2 was located 0.16 mile from the subject property and sold proximate to the assessment date. Comparable #2 sold on July 6, 2011, for a price of \$1,600,000 or for \$325.93 per square foot of living area, land included. The subject's assessment reflects a market value of \$407.72 per square foot of living area, including land, that is higher than the market value of the best comparable in the record. Based on the evidence in the record, the Board finds a reduction in the subject's assessment is 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

Klaus Albino

Member

[Signature]

Member

Member

Jerry White

Acting 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: July 24, 2015

[Signature]

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.