



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

APPELLANT: Brian Basic
DOCKET NO.: 11-28553.001-R-1 through 11-28553.013-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Brian Basic, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
11-28553.001-R-1	30-31-311-015-1002	506	3,533	\$4,039
11-28553.002-R-1	30-31-311-015-1003	619	4,319	\$4,938
11-28553.003-R-1	30-31-311-015-1013	616	4,302	\$4,918
11-28553.004-R-1	30-31-311-015-1014	496	3,463	\$3,959
11-28553.005-R-1	30-31-311-015-1016	509	3,555	\$4,064
11-28553.006-R-1	30-31-311-015-1018	660	4,605	\$5,265
11-28553.007-R-1	30-31-311-015-1019	626	4,372	\$4,998
11-28553.008-R-1	30-31-311-015-1025	905	6,319	\$7,224
11-28553.009-R-1	30-31-311-015-1027	495	3,459	\$3,954
11-28553.010-R-1	30-31-311-015-1028	478	3,338	\$3,816
11-28553.011-R-1	30-31-311-015-1029	726	5,067	\$5,793
11-28553.012-R-1	30-31-311-015-1034	932	6,502	\$7,434
11-28553.013-R-1	30-31-311-015-1042	929	6,485	\$7,414

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 of this appeal consists of thirteen parcels from a condominium association. No other descriptive information regarding the parcels was included with the appeal. The property has a 72,541 square foot site and is located in Lansing, Thornton Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted limited evidence disclosing one of the subject's condominium units was purchased on February 5, 2013 for a price of \$23,000. In addition, the appellant submitted a comparability analysis for the subject's thirteen parcels derived from two sales from January and March 2008. Based on this evidence, the appellant requested a reduction in the subject's assessments to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for thirteen of the subject's condominium units of \$67,816. The subject's assessments reflects market values ranging from \$38,160 to \$74,340 per parcel, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of the assessment the board of review submitted an analysis prepared by Dan Michaelides, an analyst with the Cook County Board of Review. He indicated the total consideration for sales of three residential units from the subject's condominium association from 2007 to 2008 was \$209,000. The analyst deducted \$4,180 or 2% of the total sales prices from the total consideration to account for personal property to arrive at a total adjusted consideration of \$204,820. Dividing the total adjusted consideration by the percentage of interest of ownership in the condominium for the units that sold of 6.183% indicated a full value for the condominium property of \$3,312,631. The analyst then applied the percentage of interest the subject units had in the condominium of 24.68% to arrive at a full value for the subject condominium units of \$817,557. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 appellant provided limited evidence of the sale of one of the subject's condominium units. The appellant failed to complete Section IV - Recent Sale Data of the appeal which would have disclosed whether the parties to the transaction were related, whether the property was sold using a Realtor, whether the property had been advertised on the open market and the length of time the property was marketed. The appellant's evidence included a Multiple Listing Service (MLS)

data sheet indicating the property was listed in October 2007 for \$75,900, however, the sheet does not include a closing date or sale price. The appellant's evidence included a Special Warranty Deed that revealed that the grantee is prohibited from selling the property for more than \$27,600, which is not the amount the appellant claims the property was purchased. As to the parties' remaining comparable sales used to assess the subject, the Board finds the sales are dated and not reflective of the subject's market value as of the assessment date at issue. The Board finds the appellant has failed to submit substantive documentary evidence to support the assertion the subject is overvalued. The Board further finds the one sale submitted by the appellant was dated and not well supported in this record. Therefore, the Board has concluded that the appellant has failed to meet the burden of proof necessary to challenge the subjects' assessments on the grounds of overvaluation.

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



Acting Member

DISSENTING: _____

CERTIFICATION

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: November 23, 2016



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.