



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

APPELLANT: Athena Soulides
DOCKET NO.: 12-25077.001-R-1
PARCEL NO.: 15-21-416-015-0000

The parties of record before the Property Tax Appeal Board are Athena Soulides, the appellant, by attorney George J. Relias of Relias & Tsonis, LLC 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: \$3,325
IMPR.: \$21,274
TOTAL: \$24,599

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 2012 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 of frame and masonry construction. The dwelling is approximately 56 years old and has 2,393 square feet of living area. Features of the home include a partial unfinished basement and a two-car garage. The property has a 6,650 square foot site and is located in Westchester, Proviso Township, Cook County. The subject is classified as a class 2-78 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 information

on three comparable sales that sold from October 2011 to April 2012 for prices that ranged from \$115,000 to \$135,000 or from \$61.46 to \$94.61 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$24,599. The subject's assessment reflects a market value of \$245,990 or \$102.80 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 information on four equity comparables.

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 of review submitted four equity comparables; however, the Board gives no weight to the board of review's equity evidence as it is not responsive to the appellant's overvaluation argument.

The appellant indicated this appeal was based on comparable sales and submitted three sales in support of this argument. The Board finds the appellant's evidence demonstrates these sales were not comparable to the subject property. The appellant's comparables had significantly less living area than the subject and different assigned classification codes. Furthermore, the appellant's own evidence raised questions about the arm's length nature of the comparables' sale prices. The appellant provided the Multiple Listing Service listing sheets for the comparable sales. The listing sheets for comparables #1 and #3 revealed that these properties were described as "pre-foreclosure." The listing sheet for comparable #2 indicated its sale price may have been influenced by friendship: "Seller sold to long time tenant at favorable price due to their strong and long relationship." Notwithstanding these deficiencies, the appellant's three comparables sold for prices ranging from \$61.46 to \$94.61 per square foot of building area, including land. The subject's assessment reflects a market value of \$102.80 per square foot of building area, which is slightly above the range but seems justified after considering its larger living area. Based on the evidence in the record, the Board finds a reduction in the subject's assessment is not 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



Member

Member



Acting 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 22, 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.