



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

APPELLANT: Christine Okelman
DOCKET NO.: 12-35616.001-C-1 through 12-35616.005-C-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Christine Okelman, the appellant(s), 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
12-35616.001-C-1	29-29-312-010-0000	20,562	15,442	\$36,004
12-35616.002-C-1	29-29-312-011-0000	13,749	23,202	\$36,951
12-35616.003-C-1	29-29-312-012-0000	14,310	12,539	\$26,849
12-35616.004-C-1	29-29-312-024-0000	14,317	15,323	\$29,640
12-35616.005-C-1	29-29-312-026-0000	13,031	18,713	\$31,744

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 one-story industrial building that contains 80,480 square feet of building area. It was constructed in 1963. It is situated on a 106,777 square foot site and it is located in Thornton Township, Cook County. The subject is classified as a class 5 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 five land comparable properties suggested as comparable to the subject. The comparables have sale dates that range from February 2008 to November 2009. They have sale prices that range from \$30,000 to \$825,000. The appellant also submitted seven sale

comparables. The sales range in date from November 2008 to January 2012. The properties have sale prices that range from \$30,000 to \$800,000, or from \$3.00 to \$14.75 per square foot of building area. The Board notes that the appellant also submitted an appraisal for a property other than the subject.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$161,188. The subject's assessment reflects a market value of \$644,752 or \$8.01 per square foot of building area, including land, when applying the 2012 level of assessment for class 5 property under the Cook County Real Property Assessment Classification Ordinance of 25%. In support of its contention of the correct assessment the board of review submitted the subject's property record card and also submitted five properties suggested as comparable to the subject. The comparables have sale dates that range from July 2008 to December 2011. They have sale prices that range from \$330,000 to \$1,900,000, or from \$9.43 to \$31.09 per square foot of building area, including land.

At hearing, the Administrative Law Judge stated that the subject property listed in the appellant's appraisal is a different property than the subject property at hand. The appellant presented a witness to discuss the comparable properties listed in the appellant's brief. The witness, Appraiser Shawn Schneider of Zimmerman Real Estate Group, Ltd., stated the subject is used as a garbage dump, and that due to the unique nature of the property it was difficult to find comparable sales. The appraiser stated that five of the comparables are arm's-length sales awhile two of the sales, comparables #1 and #3, were REO sales and that at the time these properties sold, REO sales dominated the local real estate market. The appraiser stated the subject has a market value of \$406,000.

The board of review's representative stated that shortly after the subject was purchased, its assessor's classification changed from class 5 to class 8. The appellant's attorney stated that the person who compiled the board of review's comparables was not present to testify and therefore, objected to the submission of these comparables. The Administrative Law Judge stated the comparables are in evidence as part of the board of review's initial evidence submission and that the fact that the person who compiled the evidence was not present to testify would go the weight of the board of review's evidence. The appellant listed differences between the board of review's comparables and the subject. The appellant also indicated that several of the board of review's sales did not involve brokers. The appellant's attorney argued that, based on these comparables, the subject's market value is \$405,000.

The board of review's representative stated that the board's comparables support the subject's assessment and that the subject has 80,480 square feet of building area and not 37,337 square feet of building area, as indicated by the appellant.

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 subject has 80,480 square feet of building area as indicated by the property record cards submitted by the board of review. The appellant did not submit any evidence to support the contention that the subject has 37,337 square feet of building area. The Board finds the best evidence of market value to be the appellant's sale comparables #5 and #7 and the board of review's sale #1. These comparables have sale prices that range from \$9.43 to \$14.75 per square foot of building area, including land. The subject's assessment reflects a market value of \$644,752 or \$8.01 per square foot of living area, including land, which is below the range established by the best comparable sales in the record. Based on this evidence the Board finds a reduction in the subject's assessment 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. Pursuant to Section 1910.50(b) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(b)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Acting Member



Member



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: December 19, 2017



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 or years of the same general assessment period, as provided in Sections 9-125 through 9-225, 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 such subsequent year or years 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 OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

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.

PARTIES OF RECORD

AGENCY

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