



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

APPELLANT: Sourabh Nagale
DOCKET NO.: 13-25766.001-R-1
PARCEL NO.: 18-06-318-010-0000

The parties of record before the Property Tax Appeal Board are Sourabh Nagale, the appellant(s), by attorney Christopher G. Walsh, Jr., Attorney at Law in Chicago; 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:

LAND: \$ 6,562
IMPR.: \$ 80,294
TOTAL: \$ 86,856

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 2013 tax year. The Property Tax Appeal Board (the "Board") finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject consists of a two-story dwelling of masonry construction with 3,936 square feet of living area. The dwelling is four years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace, and a three-car garage. The property has a 9,375 square foot site, and is located in Western Springs, Lyons 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 evidence disclosing the subject property was purchased on January 15, 2010 for a price of \$275,000. Based on this evidence, the appellant requested a reduction in the subject's assessment to 10.00% of the purchase price. The Illinois Real Estate Transfer

Declaration submitted by the appellant states that the subject will be the buyer's principal residence, and, therefore, the subject is owner occupied. The appellant also submitted a black and white photograph of the subject, which shows a two-story dwelling of masonry construction.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$86,856. The subject's assessment reflects a market value of \$868,560, or \$220.67 per square foot of living area, including land, when applying the 2013 statutory level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00%.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables and two sale comparables. The board of review also submitted evidence that the subject sold in January 2010 for \$275,000. Moreover, the board of review's evidence states that the subject is a 50 year old, one-story dwelling of masonry construction with 1,092 square feet of living area. The board of review also submitted a black and white photograph of the subject dated September 6, 2007, which shows a one-story dwelling of masonry construction.

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 notes that the parties gave vastly different descriptions of the subject, and provided photographs of the subject that varied significantly. For example, according to the appellant, the subject is 4 years old, while, according to the board of review, the subject is 50 years old. As such, the Board further finds that the appellant purchased the subject in January 2010, and subsequently demolished the improvement thereon (which was the improvement described by the board of review). The appellant then erected a larger dwelling, as described in the appellant's evidence. Thus, the Board finds that the purchase of the subject in January 2010 for \$275,000 was for previous dwelling upon the subject. The Board does not find that the purchase of the subject in January 2010 fairly represents the subject's fair cash value as of January 1, 2013, as the new dwelling is much larger and newer. Therefore, the Board finds that the appellant has not proven, by a preponderance of the evidence, that the subject is overvalued, and 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



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: October 21, 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.