



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

APPELLANT: Ravi Kumar
DOCKET NO.: 13-25798.001-R-1
PARCEL NO.: 09-09-401-106-0000

The parties of record before the Property Tax Appeal Board are Ravi Kumar, the appellant, by attorney David C. Dunkin of Arnstein & Lehr, LLP 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 **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:	\$619
IMPR.:	\$17,506
TOTAL:	\$18,125

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 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 masonry townhome with 1,600 square feet of living area. The townhouse was constructed in 2003. Features of the townhome include a partial basement finished as a recreation room, central air conditioning and a two-car garage. The property has a 953 square foot site and is located in Chicago, Maine Township, Cook County. The subject is classified as a class 2-95 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 four comparable sales located on the same block as the subject property. The comparables consist of two-story masonry townhomes that were built in 2003 and each contains 1,600 square feet of living area with a partial finished basement, central air conditioning and a two-car garage. One of the comparables also has a fireplace. These

properties sold between February 2012 and January 2013 for prices ranging from \$135,000 to \$195,500 or from \$84.38 to \$122.19 per square foot of living area, including land.

Based on this evidence, the appellant requested a total assessment of \$17,000 which would reflect a market value of \$170,000 or \$106.25 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 \$22,258. The subject's assessment reflects a market value of \$222,580 or \$139.11 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales two of which have the same neighborhood code assigned by the assessor as the subject property. The comparables consist of two-story frame or masonry townhomes that were built between 2003 and 2009. The townhomes range in size from 1,600 to 2,073 square feet of living area. Two of the comparables have partial finished basements and each has central air conditioning. One of the comparables has a fireplace and each has a two-car garage. The properties sold between April 2010 and July 2012 for prices ranging from \$220,000 to \$286,000 or from \$112.07 to \$153.60 per square foot of living area, including land.

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

The parties submitted a total of eight comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparables #1 and #2 as these properties sold in 2010, a date more remote in time to the valuation date at issue and thus less likely to be indicative of the subject's estimated market value as of January 1, 2013. The Board has also given reduced weight to board of review comparable #3 as this property has a crawl-space foundation which is inferior to the subject's partial basement foundation. Reduced weight was also given to board of review comparable #4 as this dwelling is significantly larger than the subject dwelling of 1,600 square feet.

The Board finds the best evidence of market value to be the appellant's comparable sales which are all nearly identical to the subject property, but for comparable #1 having a fireplace. These comparables sold between February 2012 and January 2013 for prices ranging from \$135,000 to \$195,500 or from \$84.38 to \$122.19 per square foot of living area, including land. The subject's assessment reflects a market value of \$222,580 or \$139.11 per square foot of living area,

including land, which is above the range established by the best comparable sales in this record. Based on this evidence the Board finds a reduction in the subject's assessment is 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.



Chairman



Member

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: May 20, 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.