



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

APPELLANT: Giselle Quilly-Sacrison
DOCKET NO.: 13-33543.001-R-1
PARCEL NO.: 13-16-415-015-0000

The parties of record before the Property Tax Appeal Board are Giselle Quilly-Sacrison, the appellant(s); 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: \$ 6,062
IMPR.: \$ 33,389
TOTAL: \$ 39,451

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, single-family dwelling of stucco construction. The dwelling was constructed in 1910. Features of the home include a full unfinished basement, air conditioning, one fireplace, and a two and one-half baths. The property has a 5,052 square foot site and is located in Chicago, Jefferson Township, Cook County.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables. In addition, the appellant contends that the subject's size is incorrect per the

board of review's evidence. Specifically, the appellant contends that the subject contains 2,193 square feet of living area. In support, the appellant submitted a plat of survey, blue prints, a building code sheet signed by an architect with the subject's size listed as 2,193 square feet of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$39,541. The subject property contains 2,488 square feet of living area and has an improvement assessment of \$33,389 or \$13.42 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables and sales data for one of the comparables.

Lastly, the board of review submitted an additional four equity comparables to support the subject's assessment of \$15.22 per square foot of living area per the subject's size of 2,193 square feet of living area.

In rebuttal, the appellant's attorney submitted an additional four equity comparables, assessor's printouts, and dormer rules from the Department of Construction and Permits. The Official Rules of the Property Tax Appeal Board prohibit the submission of new evidence as rebuttal and, therefore, the equity comparables cannot be considered by the Board. 86 Ill.Admin.Code 1910.66.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

As to the subject's square footage, the Board finds the appellant submitted sufficient evidence to show that the subject contains 2,193 square feet of living area. The appellant submitted signed documentation by an architect and blue prints supporting the subject's size. Therefore, the Board finds that subject contains 2,193 square feet of living which reflects an improvement assessment of \$15.22 per square foot of living area.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2 and #3 and the board of review's comparables #3 and #4 from the second grid. These comparables had improvement assessments that ranged from \$12.25 to \$17.87 per

square foot of living area. The subject's improvement assessment of \$15.22 per square foot of living area falls within the range established by the best comparables in this record. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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.

Mario Albino

Chairman

K. L. Ferr

Member

JR

Member

Jerry White

Acting Member

Robert Hoffmann

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

A. Heston

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.