



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

APPELLANT: Grappler Properties, LLC
DOCKET NO.: 14-29583.001-R-1
PARCEL NO.: 16-15-316-013-0000

The parties of record before the Property Tax Appeal Board are Grappler Properties, LLC, the appellant(s); 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: \$2,925
IMPR.: \$3,575
TOTAL: \$6,500

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 2014 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 is a 101 year-old, two-story dwelling of masonry construction containing 1,756 square feet of living area. Features of the home include a full unfinished basement and a one-car garage. The property has a 2,925 square foot site and is located in West Chicago Township, Cook County. The property is a Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted a settlement statement disclosing the subject property was purchased on May 13, 2011 for a price of \$65,000 in an all-cash transaction. The appellant also submitted a Multiple Listing Service listing information sheet disclosing the subject was sold a "short sale, Pre-foreclosure" property; and information in Section IV–Recent Sale Data of the Residential Appeal that the subject was not sold as a transfer between related parties, was advertised and sold through a realtor, and was sold in settlement of a foreclosure. The appellant also submitted five sales

comparables and cited the subject's sale as a comparable. The appellant also submitted adjustment information. Based on this evidence, the appellant requested a reduction in the assessment to \$1,861.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$14,638. The subject's assessment reflects a market value of \$146,380 or \$83.36 per square foot of living area when using the 2014 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance. The subject's sale price of \$65,000 reflects a market value of \$37.02 per square foot of living area including land. In support of its contention of the correct assessment, the board of review submitted information on four suggested comparable sales.

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 Board finds the appellant failed to lay a foundation for the adjustments in the equalization values grid submitted and, therefore, give them no weight. The appellant also submitted data on the subject and averred it was an additional sale comparable. The Board gives no weight to the subject as a sale comparable. *See Pace Realty Group v. Property Tax Appeal Board*, 306 Ill.App.3d 718 (2nd Dist. 1999).

The Board finds the best evidence of market value to be the purchase of the subject property in May 2011 for a price of \$65,000. The appellant provided information in Section IV-Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, and the property had been advertised on the open market the Multiple Listing Service. In further support of the transaction, the appellant submitted a copy of the settlement statement. Although the appellant's evidence disclosed the subject's sale was compulsory, the additional evidence submitted confirmed the subject's market value. Based on this record the Board finds the subject property had a market value of \$65,000 as of January 1, 2014 and that a reduction in the subject's assessment is justified. Since market value has been determined, the 2014 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance shall apply. As a result, the Board finds the subject property is equitably assessed, thereby obviating the need to rule on the appellant's overvaluation argument based on sales market data.

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: January 27, 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 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.