



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

APPELLANT: Joseph Parrillo
DOCKET NO.: 15-35954.001-R-1
PARCEL NO.: 12-11-210-032-0000

The parties of record before the Property Tax Appeal Board are Joseph Parrillo, the appellant, by attorney Joanne Elliott, of Elliott & Associates, P.C. in Des Plaines; 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: \$9,152
IMPR.: \$69,070
TOTAL: \$78,222

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 2015 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 multi-level dwelling of frame and masonry construction with 4,166 square feet of living area.¹ The dwelling is approximately 49 years old. Features of the home include a partial basement that is finished, central air conditioning, one fireplace, a two-car garage and an indoor swimming pool. The property has an 8,320 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.²

¹ The Board finds the best evidence of the subject's building style, size and whether the subject has an indoor swimming pool is the subject's building sketch within the appellant's appraisal.

² Based on the sketch of the subject's multi-level design, the subject appears to be a class 2-34 property. However, as a class 2 property, the classifications are assessed at the same 10% of market value level.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$675,000 as of January 1, 2014. The appellant's appraisal utilized the sales comparison approach in estimating a market value for the subject property. The appellant's appraiser selected four comparable properties that were located from .22 of a mile to 2.27 miles from the subject property. One property was located in Chicago, one in Park Ridge and two in Norridge, Illinois. Three of the comparables were described as "Colonial" style dwellings and one was a "Contemporary" style dwelling that ranged in size from 2,615 to 4,481 square feet of living area. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates ranging from February to September 2013 and sold for prices ranging from \$575,000 to \$727,999 or from \$131.67 to \$228.18 per square foot of living area, including land. Based on this data, the appellant's appraiser arrived at an opinion of market value for the subject of \$675,000 as of January 1, 2014.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$78,222. The subject's assessment reflects a market value of \$782,220 or \$187.76 per square foot of living area including land, when using 4,166 square feet of living area and using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a grid analysis containing information on four sales. The comparables were two-story frame or masonry dwellings that ranged in size from 3,867 to 4,048 square feet of living area. The comparables range in age from 1 to 59 years old and have other features with varying degrees of similarity to the subject. The sales occurred from February 2013 to June 2015 for prices ranging from \$780,000 to \$1,509,145 or from \$198.37 to \$372.81 per square foot of living area including land.

The appellant submitted rebuttal critiquing the board of review's submission.

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.

As an initial finding regarding the appellant's January 2014 appraisal for the subject property, the Board finds its effective date occurring 12 months prior to the January 1, 2015 assessment date is less probative of the subject's market value as of the assessment date at issue. Likewise, the Board gave less weight to the sales used in the appraisal due to their sale date occurring in 2013. Furthermore, three of the sales used by the appellant's appraiser were located in different cities than where the subject is located.

The Board finds the best evidence of market value to be the board of review's comparable sale #1. This comparable was most similar to the subject in location, design and size, but is older in age, smaller in dwelling size and has inferior features. This comparable also sold more proximate in time to the January 1, 2015 assessment date at issue than did the comparable sales used in the appellant's appraisal. The board of review's best comparable sold in July 2014 for a price of \$780,000 or \$198.37 per square foot of living area, land included. The subject's assessment reflects a market value of \$782,220 or \$187.76 per square foot of living area, including land, which is supported by the best comparable in this record and appears justified given the subject's superior characteristics. The Board gave less weight to the board of review's remaining sales due to their significantly newer ages and/or older sale date. Based on this record, 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(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) 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



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: November 20, 2018



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Joseph Parrillo, by attorney:
Joanne Elliott
Elliott & Associates, P.C.
1430 Lee Street
Des Plaines, IL 60018

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602