



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

APPELLANT: Patricia Wosick
DOCKET NO.: 17-28234.001-R-1
PARCEL NO.: 08-11-420-012-0000

The parties of record before the Property Tax Appeal Board are Patricia Wosick, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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: \$4,125
IMPR.: \$18,490
TOTAL: \$22,615

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 2017 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 61-year old, one-story, single-family dwelling of masonry exterior construction with 1,231 square feet of living area. Features of the home include a basement with a formal recreation room,¹ central air conditioning, and a one-car garage. The property has a 7,500 square foot site and is located in Mt. Prospect, Elk Grove Township, Cook County. The subject is classified as a class 2-03, residential 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 within the same neighborhood

¹ The parties disagree as to the subject's foundation with the appellant reporting that the subject is built on a crawl-space foundation and the board of review asserting that the subject has a full basement. Based on both parties' report that the subject has a "formal rec. room", the Board will analyze this appeal as if the subject has a basement.

code as the subject property. The comparables have sites ranging in size from 7,800 to 11,250 square feet of land area and are improved with class 2-03 dwellings of masonry or frame and masonry exterior construction that range in size from 1,122 to 1,690 square feet of living area. The dwellings range in age from 60 to 64 years old. Each comparable has an unfinished basement and a 1-car or 2-car garage; one comparable has central air-conditioning; and two comparables have one or two fireplaces. The comparables sold from March 2015 to October 2016 for prices ranging from \$161,000 to \$278,000 or from \$122.25 to \$175.51 per square foot of living area, including land. The appellant also submitted Warranty Deeds associated with the four comparable sales which disclosed the legal description and the legal rights being conveyed but lacked any physical description and/or sale data with regard to these properties. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$18,261.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$22,615. The subject's assessment reflects a market value of \$226,150 or \$183.71 per square foot of living area, land included, when applying the level of assessment for class 2 properties of 10% as determined by the Cook County classification ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparables with equity data. The board of review failed to address the appellant's overvaluation argument with market value evidence.

Based on this equity 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

Initially, the Board finds that the evidence submitted by the board of review was not responsive to the appellant's market value/overvaluation argument based on the fact that the comparables presented by the board of review did not contain any sales data including dates of sales, total sale prices, and sale price per square foot of living area for the Board to be able to conduct a meaningful comparative market value analysis.

The Board finds the only evidence of market value in the record consists of four comparable sales submitted by the appellant. The Board gave less weight to appellant's comparable sales #1 and #3 based on their sale dates in March and July 2015, dates less proximate in time to the January 1, 2017 assessment date at issue and, therefore, less likely to be indicative of the subject's market value as of the assessment date than the remaining two sales in the record.

The Board finds the best evidence of market value to be appellant's comparables #2 and #4, although they differ from the subject in having unfinished basements and larger dwelling sizes when compared to the subject. These two best comparables in the record are most similar to the subject in location, design, age, and some features. These comparables sold in April and October 2016 for prices of \$230,000 and \$278,000 or for \$136.09 and \$175.51 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$226,150 or \$183.71 per square foot of living area, including land, which is below the two best comparable sales in this record on an overall value basis. The subject's higher price per square foot of living area appears to be logical based on smaller dwelling size and the accepted real estate principle of economies of scale which dictates that when all other factors are similar, as the size of a property increases, its per unit value decreases, and in contrast, as size of property decreases, its per unit value increases. Thus, the subject being smaller than the two best comparable dwellings in the record, it would be expected to have a higher price per-square foot of living area. Additionally, the subject's assessment is supported given its formal recreational room amenity compared to the two best comparables in the record which have unfinished basements.

After considering adjustments to the comparables for differences from the subject, the Board finds that the subject property is not overvalued and, therefore, no reduction in the subject's assessment is 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. 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: March 16, 2021



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

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