



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

APPELLANT: Victoria Iheohakara
DOCKET NO.: 17-45305.001-R-1
PARCEL NO.: 30-17-302-047-1007

The parties of record before the Property Tax Appeal Board are Victoria Iheohakara, the appellant, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; 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: \$500
IMPR.: \$1,400
TOTAL: \$1,900

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 is a residential condominium unit in a 15-unit residential condominium development that was constructed in approximately 1976. The property has a 23,085 square foot site and is located in Calumet City, Thornton Township, Cook County. The record does not disclose details of the subject property or whether the subject was owner-occupied in the lien year. The subject is classified as a class 2-99 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 five comparable sales located within 0.05 of a mile from the subject property. Each comparable is a similar residential condominium unit constructed in 1976. The comparables sold from March 2016 to June 2017 for prices ranging from \$15,120 to \$30,000. The record did not disclose the square foot of living area or other property

characteristics of the comparable properties. Based on this evidence, the appellant requested the subject's assessment be reduced to \$1,900 which reflects a market value of \$19,000 when applying the level of assessment for Class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The appellant reported that the subject had a total assessment of \$5,056.

The board of review did not submit its "Board of Review Notes on Appeal" for the subject property. The Board finds the subject has a total assessment of \$5,056 as reported in the appellant's appeal petition, which was unrefuted by the board of review. The subject's assessment reflects a market value of \$50,560 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 a Condominium Analysis for the subject property which included information on four comparable sales of similar residential condominium units, two of which were submitted by the appellant. The comparables sold from March 2007 to November 2016 for prices ranging from \$15,120 to \$78,000. The comparable sales contained from 6.07% to 6.97% ownership interest in the condominium. The board of review analysis disclosed the subject had a 6.96% ownership interest in the condominium. Based on this evidence, the board of review requested the subject's assessment be confirmed.

The appellant, through counsel, submitted rebuttal comments noting the board of review's comparables #1 and #2 sold in 2007 a date too remote in time to establish market value as of the January 1, 2017 assessment date at issue. The appellant also commented that board of review comparables #3 and #4 were also submitted by the appellant.

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 record contains seven comparable sales for the Board's consideration as two comparables were common to both parties. The Board gave less weight to the board of review condominium analysis as comparables #1 and #2 sold in 2007 which are dated and less likely to reflect the subject's market value as of the January 1, 2017 assessment date.

The Board finds the best evidence of market value to be the appellant's comparable sales which includes the two common comparables. These comparables sold from March 2016 to June 2017 for prices ranging from \$15,120 to \$30,000 per square foot of living area, including land. The subject's assessment reflects a market value of \$50,560, including land, which falls 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, commensurate with the appellant's request, 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. 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:

May 18, 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

AGENCY

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