



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

APPELLANT: Sabu Achettu, Rents R Us LTD
DOCKET NO.: 17-45419.001-R-1
PARCEL NO.: 15-16-124-051-0000

The parties of record before the Property Tax Appeal Board are Sabu Achettu, Rents R Us LTD, 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 **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: \$623
IMPR.: \$7,195
TOTAL: \$7,818

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 consists of a two-story town home of masonry exterior construction with 896 square feet of living area. The dwelling is approximately 64 years old and features an unfinished basement. The property has a 1,247 square foot site and is located in Bellwood, Proviso Township, Cook County. The subject is classified as a class 2-10 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 evidence disclosing the subject property was purchased on September 10, 2015 for a price of \$24,559.¹ The appellant completed Section IV-Recent Sale Data disclosing the

¹ The parties reported different sale dates and purchase prices. The appellant's settlement statement indicates a purchase price of \$24,559 in September 2015 while the board of review reported a purchase price of \$23,000 in November 2015.

transaction was not between family members or related corporations, that the subject was sold by a realtor and that it was advertised in the Multiple Listing Service (MLS). The appellant submitted the subject's MLS listing sheet which reported the property was listed for nine days on market, was a bank owned property and was sold in "as is" condition. The settlement statement submitted by the appellant disclosed that commissions were paid to real estate agents.

In addition to the subject's sale information, the appellant submitted five comparable sales located within 0.05 of a mile from the subject. The comparables range in size from 847 to 912 square feet of living area and are either 64 or 65 years old. Each comparable has one bathroom and one unit has central air conditioning.² The comparables sold from February 2016 to February 2017 for prices ranging from \$36,100 to \$47,000 or from \$40.29 to \$55.49 per square foot of living area, land included. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$2,456 which reflects the 2015 purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$7,818. The subject's assessment reflects a market value of \$78,180 or \$87.25 per square foot of living area, land included, when applying the median 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 information on four comparable sales located within 0.25 of a mile from the subject property. The comparables are similar class 2-10 two-story town homes. The comparable units range in size from 896 to 1,007 square feet of living area and range in age from 65 to 70 years old.³ Each comparable has one bathroom and two of the comparables have central air conditioning. The dwellings each have unfinished basements. The comparables sold from June 2016 to July 2017 for prices ranging from \$80,000 to \$100,000 or from \$89.29 to \$99.30 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In rebuttal, the appellant's attorney critiqued the board of review's comparables stating that its comparables #1 and #2 are not comparable properties due to differences in size and style. The appellant's attorney indicated board of review comparables #3 and #4 were acceptable 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

² The appellant did not provide a description of the comparable properties. Photographic evidence depicts two-story townhome style buildings.

³ The board of review's grid analysis reports comparable #2 as being a one-story building, however, photographs of the property show a two-story building. Nevertheless, the property is a class 2-10 building, similar to the subject.

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.

The parties submitted nine comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparable #1 along with board of review comparables #1 and #2 which include central air conditioning, a feature lacking in the subject property.

The Board finds the best evidence of market value in the record to be the appellant's comparables #2, #3, #4 and #5 along with board of review comparables #3 and #4 which are similar to the subject in location, age, design, dwelling size and features. These properties also sold proximate in time to the assessment date at issue. These best comparables sold from February 2016 to July 2017 for prices ranging from \$43,000 to \$85,000 or from \$47.31 to \$93.20 per square foot of living area, including land. Board of review comparable #4 is considered to be most similar to the subject with equal dwelling size. This property sold in June 2017 for \$80,000 or \$89.29 per square foot of living area, land included. The subject's assessment reflects a market value of \$78,180 or \$87.25 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. The Board gave little weight to the subject's sale due to the fact the sale did not occur proximate in time to the assessment date at issue as well as the fact that the property was a bank owned sale which calls into question whether the purchase price is reflective of fair cash value. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's assessment is reflective of market value 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. 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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