



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

APPELLANT: Seby and Rani Edassery  
DOCKET NO.: 19-28741.001-R-1  
PARCEL NO.: 09-22-120-001-0000

The parties of record before the Property Tax Appeal Board are Seby and Rani Edassery, 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 **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:** \$ 8,577  
**IMPR.:** \$ 58,577  
**TOTAL:** \$ 67,154

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) after receiving a decision from the Cook County Board of Review. The instant appeal challenges the assessment for tax year 2019. The Property Tax Appeal Board (the "Board") finds that it has jurisdiction over the parties and the subject matter of this appeal.

**Findings of Fact**

The subject consists of a two-story dwelling of masonry construction with 3,139 square feet of living area. The dwelling is 13 years old. Features of the home include a full basement with a formal recreation room, central air conditioning, a fireplace, and a two-car garage. The property's site is 10,020 square feet, and it is located in Maine Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument, the stated that the subject's total assessment increased from \$57,017 to \$67,154, and that the current "valuation does not reflect the fair market value for our house." The appellant further argued that the subject has been listed for sale on the MLS for one year at a list price of \$649,000. The appellant submitted the printout from the MLS in support of this assertion. The appellant's brief states that only one offer to purchase the subject was received during this time

period, which was for \$580,000; but that after some negotiations, the appellant ultimately rejected this offer. Additionally, the appellant argued that the subject's location decreases its market value, as the subject is located on Dempster Street (which is a busy street) and also because of frequent flooding. No evidence was submitted in support of the arguments regarding the subject's alleged disadvantaged location. In Section II of the appeal form, the appellant stated that the subject is owner-occupied. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$59,850.

The board of review submitted its "Board of Review Notes on Appeal" disclosing that the total assessment for the subject is \$67,154. The subject property has an improvement assessment of \$58,577, or \$18.66 per square foot of living area. The subject's assessment reflects a market value of \$671,540, or \$213.93 per square foot of living area, including land, when applying the 2019 statutory level of assessment for class 2 property of 10.00% 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 equity comparables, and two sale comparables. These sale comparables sold from April 2016 to March 2017 for \$614,250 to \$675,000, or \$231.71 to \$235.85 per square foot of living area, including land.

In rebuttal, the appellant argued that the board of review's comparables were not similar to the subject because none of these comparables were located on a busy street like Dempster Street. The appellant also reaffirmed the arguments previously made.

At hearing, the appellant, appearing *pro se*, made the same arguments raised in the appellant's initial submission. During cross-examination from the board of review, the appellant testified that the subject was sold in July 2021 for \$640,000, but that this sale price was only realized due to an increase in the housing market. The appellant also testified that he was unable to locate comparables located on Dempster Street to support the equity argument.

### **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 proven 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.

The appellant's only evidence regarding the subject's market value was the printout from the MLS, which showed that the subject was listed for sale for one day for a price of \$649,900. This evidence does not show, by a preponderance of the evidence, that the subject is overvalued. A list price does not constitute an arm's-length transaction involving a willing buyer and a willing seller. See Joliet Twp. High Sch. Dist. 204 v. Ill. Prop. Tax Appeal Bd., 2021 IL App (3d) 190477, ¶ 27. Instead, it is only one side of the equation, namely, the willing seller. The

appellant did not submit any further evidence as to the subject's market value. Therefore, the Board finds that the appellant has not proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment is not warranted.

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proven by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof, and that a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of assessment equity to be board of review equity comparables #1, #3, and #4. These equity comparables had improvement assessments ranging from \$20.35 to \$22.70 per square foot of living area. The subject's improvement assessment of \$18.66 per square foot of living area falls below the range established by the best comparables in this record. The appellant's arguments regarding the subject's alleged disadvantaged location were given no weight in the Board's analysis. While the appellant's arguments regarding the location on a busy street and frequent flooding may have merit, it is the appellant's burden to prove as such with clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). As the board of review analyst correctly pointed out at the hearing, the appellant submitted no evidence in support of these arguments. Based on this record, the Board finds the appellant has not proven, with clear and convincing evidence, that the subject is inequitably assessed, and that a reduction in the subject's assessment is not 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:

April 19, 2022



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

Seby and Rani Edassery  
9133 Linder Ave  
Skokie, IL 60077

COUNTY

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