



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

APPELLANT: Vilija Andriuskeviciute
DOCKET NO.: 20-20803.001-R-1
PARCEL NO.: 23-03-405-011-0000

The parties of record before the Property Tax Appeal Board are Vilija Andriuskeviciute, the appellant, by attorney John W. Zapala, of the Law Offices of John Zapala, P.C. in Chicago; 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: \$4,709
IMPR.: \$13,377
TOTAL: \$18,086

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 2020 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 1-story dwelling of frame exterior construction with 1,092 square feet of living area. The dwelling is approximately 57 years old. Features of the home include a full basement that is finished with a recreation room and a 1-car garage. The property has an 8,190 square foot site and is located in Hickory Hills, Palos Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity regarding the improvement and overvaluation as the bases of the appeal. In support of the inequity argument the appellant submitted information on four comparables located within the same assessment neighborhood code as the subject and within .51 of a mile from the subject. The comparables are improved with class 2-03 dwellings of masonry or frame and masonry exterior construction ranging in size from 1,200 to 1,500

square feet of living area. The comparables are 48 to 57 years old and have full basements, one of which is finished with a recreation room. Each comparable has a 1-car, a 1.5-car or a 2-car garage. The comparables have improvement assessments ranging from \$13,729 to \$15,736 or from \$10.13 to \$11.44 per square foot of living area.

In support of the overvaluation argument the appellant submitted information on three comparable sales located within the same assessment neighborhood code as the subject and within .3 of a mile from the subject. The comparables are situated on sites ranging in size from 6,660 to 9,095 square feet of land area and are improved with class 2-03 dwellings with either 1,092 or 1,200 square feet of living area. The homes are 56 to 58 years old and have full or partial basements, two of which are finished with a recreation room. Comparable #3 has one fireplace. Each comparable has a 1-car garage. The comparables sold from January 2017 to November 2019 for prices of \$140,000 or \$160,000 or \$128.21 or \$133.33 per square foot of living area, including land.

Based on the foregoing evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$18,086. The subject's assessment reflects a market value of \$180,860 or \$165.62 per square foot of living area, including land. The subject property has an improvement assessment of \$13,377 or \$12.25 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables located within the same assessment neighborhood code and subarea as the subject. The comparables have sites ranging in size from 6,600 to 7,150 square feet of land area and are improved with class 2-03, 1-story dwellings of frame or frame and masonry exterior construction ranging in size from 1,079 to 1,144 square feet of living area. The comparables are 55 or 58 years old. Three comparables have partial or full unfinished basements. One comparable has a slab foundation. Two comparables have central air conditioning. Each comparable has a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$14,627 to \$18,383 or from \$13.24 to \$17.04 per square foot of living area. The comparables sold from August 2018 to August 2019 for prices ranging from \$203,500 to \$260,000 or from \$186.36 to \$240.96 per square foot of living area, including land. Based on this evidence the board review requests confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part 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 proved 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 a reduction in the subject's assessment is not warranted.

The record contains eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables which are less similar in dwelling size to the subject than the comparables submitted by the board of review. Furthermore, appellant's comparables #2 and #3 have central air conditioning and a 2-car garage when compared to the subject's which lacks central air conditioning and has a 1-car garage. The Board gives less weight to board of review comparables #1 and #4 which have central air conditioning, a feature the subject lacks. In addition, board of review comparable #4 lacks a basement foundation, which is a feature of the subject and has a 2-car garage when compared to the subject's 1-car garage.

The Board finds the best evidence of assessment equity to be board of review comparables #2 and #3 which are identical or nearly identical to the subject in location, dwelling size, age, and most features. However, both comparables lack finished basement area which is a feature of the subject. These comparables have improvement assessments of \$14,627 and \$15,268 or \$13.39 and \$13.98 per square foot of living area. The subject's improvement assessment of \$13,377 or \$12.25 per square foot of living area falls below the range established by the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not warranted.

The appellant also 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.

The record contains seven comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #3 as well as board of review comparable #3 which sold in 2017 and 2018 which are less proximate in time to the January 1, 2020 assessment date than the other sales in the record. The Board gives less weight to board of review comparable #4 which lacks a basement foundation, a feature of the subject and has a 2-car garage when compared to the subject's 1-car garage.

The Board finds the best evidence of market value to be the appellant's comparable #1 and board of review comparables #1 and #2 which sold proximate in time to the assessment date and are relatively similar to the subject in location, age, dwelling size and some features. However, each comparable lacks finished basement area unlike the subject and board of review comparable #1 has central air conditioning, a feature the subject lacks, suggesting adjustments are necessary to the best comparables to make them more equivalent to the subject. These comparables sold from April to November 2019 for prices ranging from \$160,000 to \$260,000 or from \$133.33 to \$240.96 per square foot of living area, including land. The subject's assessment reflects a market value of \$180,860 or \$165.62 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not prove by a preponderance of the evidence that a reduction in the subject's assessment is justified based on overvaluation.

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: June 18, 2024



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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