



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

APPELLANT: Anna Masnica
DOCKET NO.: 21-44259.001-R-1
PARCEL NO.: 24-11-209-067-0000

The parties of record before the Property Tax Appeal Board are Anna Masnica, the appellant, by attorney Brian S. Maher, of Weis, DuBrock, Doody & Maher, 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 **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: \$5,191
IMPR.: \$27,009
TOTAL: \$32,200

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 2021 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 three-story multi-family building of masonry exterior construction with 5,946 square feet of gross building area which is approximately 59 years old. Features include a concrete slab foundation, 6 full bathrooms, and a two-car garage. The property has an 8,652 square foot site and is located in Evergreen Park, Worth Township, Cook County. The subject is classified as a class 2-11 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 completed Section IV – Recent Sale Data reporting the subject property was purchased on December 2, 2020, for a price of \$322,000. The appellant further reported the parties to the transaction were not related and the property was sold by an estate of the deceased owner. Additionally, the property was reportedly advertised in the local paper and a sign on the

property. Furthermore, the property was not sold due to a foreclosure action, nor was it sold using a contract for deed. The appellant also submitted a copy of the Settlement Statement depicting a cash transaction. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$47,527. The subject's assessment reflects a market value of \$475,270, land included, when using the level of assessment 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, two of which are located in the subject's neighborhood code. The parcels range in size from 5,656 to 11,970 square feet of land area and are improved with class 2-11 three-story multi-family buildings of masonry exterior construction. The buildings range in age from 22 to 55 years old and range in size from 3,846 to 7,048 square feet of gross building area. Two comparables have full basements, one has a crawl-space foundation and one has a concrete slab foundation. The buildings have from 5 to 7½ bathrooms. Two comparables have central air conditioning and one comparable has a four-car garage. The comparables sold from March 2019 to July 2021 for prices ranging from \$518,000 to \$640,000, including land. The data for the subject also depicts a sale in January 2021 for \$322,000.

Based on the foregoing evidence and argument, 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant reported the December 2020 sale of the subject, which was confirmed in the board of review's evidence, and included suggested comparable properties to support the parties' respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparables #3 and #4, due to their unknown proximities to the subject given their differing neighborhood codes from the subject. The Board also gives reduced weight to board of review comparables #1, #2 and #3, due to significant differences in building size and/or foundation type when compared to the subject.

The Board finds the best evidence of market value to be the purchase of the subject property in December 2020 for a price of \$322,000. The appellant provided evidence demonstrating the sale was not between related parties and was not due to foreclosure nor was the property sold via a contract for deed. In addition, copies of the Settlement Statement was provided by the appellant. While the Board finds it is troubling that the Settlement Statement indicates this was a cash

transaction, regardless, the sale price is the best and only supported evidence of market value in the record.

The Board finds the purchase price of \$322,000 is below the market value reflected by the assessment of \$475,270. Additionally, and most notably, the Property Tax Appeal Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value. The Board finds the submission of three-story multi-family buildings in response to this appeal, located an unknown distance from the subject, differing substantially in age, building size and/or foundation type when compared to the subject, fails to overcome the appellant's sale evidence. This conclusion is further bolstered by the board of review's acknowledgement of the sale of the subject in its grid analysis.

Based on this record, the Board finds the subject property had a market value of \$322,000 as of January 1, 2021. Since market value has been determined the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. 86 Ill.Admin.Code §1910.50(c)(2).

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 20, 2025



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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