



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

APPELLANT: Qiong Wu  
DOCKET NO.: 07-26676.001-R-1  
PARCEL NO.: 14-29-427-013-0000

The parties of record before the Property Tax Appeal Board are Qiong Wu, the appellant, by attorney Adam E. Bossov, of Law Offices of Adam E. Bossov, P.C. of Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented, 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:** \$17,947  
**IMPR:** \$88,477  
**TOTAL:** \$106,424

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property is improved with a three-story dwelling of masonry construction containing 3,564 square feet of living area. The dwelling is 118 years old and is located in Chicago, Lake View Township, Cook County. The property is classified as a class 2-06 residential property under the Cook County Real Property Assessment Classification Ordinance. Features of the dwelling include central air conditioning and a 2-car garage.

The appellant contends overvaluation based on a recent sale of the subject property. To document the sale, the appellant submitted a copy of the Illinois Real Estate Transfer Declaration, PTAX-203, disclosing the subject property was purchased in 2007 for a price of \$1,060,000. The transfer declaration indicated the subject was advertised for sale, and there was no indication the parties were related. The appellant also submitted a Settlement Statement and Warranty Deed indicating the subject property was purchased in June 2007 for a price of \$1,060,000. The appellant also submitted an appraisal that indicated an estimated value of \$1,090,000 utilizing the

sales comparison approach and an estimated value of \$1,108,042 utilizing the cost approach to value. Based on this record, the appellant requested the subject's assessment be reduced to \$90,000.

The board of review submitted its "Board of Review Notes on Appeal" wherein its final assessment of the subject totaling \$124,999 was disclosed. The subject's assessment reflects a market value of \$1,245,010 using the 2007 three year average median level of assessments for class 2 property of 10.04% as determined by the Illinois Department of Revenue. (86 Ill.Admin.Code 1910.50(c)(2)).

In support of the subject's assessment, the board of review submitted a grid analysis of four comparable properties with copies of property characteristic sheets of the subject and comparables. The grid analysis provided assessment data for the subject and four comparables with the same neighborhood code as the subject. The comparables are described as two-story frame dwellings that range in age from 114 to 118 years old and range in size from 2,640 to 4,052 square feet of living area. Features of the comparables include a full basement, three of which are finished with a recreation room, central air conditioning and a 2-car garage. Two comparables have one or three fireplaces. Comparables #2 and #3 sold in April 2006 and July 2004 for a price of \$1,200,000 or \$454.55 per square foot including land and \$867,500 or \$253.80 per square foot of living area, including land, respectively. These properties have improvement assessments ranging from \$24.83 to \$38.42 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Also attached to the board of review's data was a 2-page printout of 28 sales identified only by parcel number and entitled "Class 06 2+ story old style large res within neighborhood 73093 of Township Lake View." One sale related to the subject property in June 2007 sale for \$1,060,000. The remaining 27 properties sold between March 1992 and July 2008 for prices ranging from \$1,150 to \$1,911,105. No other descriptive data was submitted for purposes of analyzing these properties.

After reviewing the record and considering the evidence, the Board finds it has jurisdiction over the parties and the subject matter of the appeal. The Board further finds the evidence in the record supports a reduction in the subject's assessment.

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. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3<sup>rd</sup> Dist. 2002). Proof of market value may consist of an appraisal of the subject property, a recent sale of the subject property or comparable sales. (86 Ill.Admin.Code 1910.65(c)). A contemporaneous sale between two parties dealing

at arm's length is not only relevant to the question of fair cash value but practically conclusive on the issue on whether the assessment is reflective of market value. Korzen v. Belt Railway Co. of Chicago, 37 Ill.2d 158 (1967). After an analysis of the evidence in the record, the Board finds the appellant has met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value in the record is the sale of the subject property in June 2007 for a price of \$1,060,000. The subject's total assessment reflects an estimated market value of \$1,245,010, which is greater than its purchase price. The Board finds the board of review provided no evidence to indicate that the subject's sale was not an arm's length transaction or not reflective of fair cash value. Based on this record the Board finds the subject had a market value of \$1,060,000 as of the January 1, 2007 assessment date. Based on this evidence the Board finds a reduction to the subject's assessment is appropriate.

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.

*Donald R. Cuit*

Chairman

*K. L. Fern*

Member

*Frank A. Huff*

Member

*Mario Morris*

Member

*J. R.*

Member

DISSENTING: \_\_\_\_\_

C E R T I F I C A T I O N

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 22, 2012

*Allen Castrovillari*

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 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 the subsequent year 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.

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.