



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

APPELLANT: Louis Skorvanek
DOCKET NO.: 13-35980.001-C-1
PARCEL NO.: 18-11-200-018-0000

The parties of record before the Property Tax Appeal Board are Louis Skorvanek, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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: \$5,684
IMPR.: \$28,966
TOTAL: \$34,650

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision from 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 2013 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 mixed-use building of masonry construction with 6,300 square feet of building area. The building is approximately 61 years old and has a partial basement that is unfinished.¹ The property has a 15,158 square foot site and is located in McCook, Lyons Township, Cook County. The subject is classified as a class 2-12 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$190,000 as of January 1, 2012. The appellant's appraisal was completed using the sales comparison approach in estimating a market value for the subject property. The appellant's appraiser

¹ The parties differ slightly as to the size of the subject building and its age. The Board finds the slight discrepancies will not impact the Board's decision in this appeal.

selected five suggested comparables located in Oak Park, Cicero, Countryside, Chicago, and Berwyn. The comparables were mixed-used buildings of masonry construction that ranged in size from 2,676 to 7,500 square feet of building area. The comparables range in age from 29 to 114 years old. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates ranging from March 2010 to June 2012 for prices ranging from \$70,000 to \$160,000 or from \$17.50 to \$30.12 per square foot of building area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$40,950. The subject's assessment reflects a market value of \$409,500 or \$65.00 per square foot of building area, land included, when using the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a grid analysis containing information on four sales that were located in Lyons, Countryside, Willow Springs, and Justice. The comparables were mixed-used buildings of frame, masonry or frame and masonry construction that ranged in size from 3,328 to 5,220 square feet of building area. The comparables range in age from 14 to 105 years old. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates ranging from October 2010 to September 2013 for prices ranging from \$256,000 to \$500,000 or from \$69.48 to \$97.92 per square foot of building area, including land.

The appellant's submitted a rebuttal critiquing the board of review's submission.

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 Board finds the best evidence of market value to be the appellant's appraisal's comparable #2, as well as the board of review's comparable sales #2, #3 and #4. These comparables were somewhat similar to the subject in location, design, age, size and features. These comparables also sold more proximate in time to the January 1, 2013 assessment date at issue than did the parties' remaining sales. The best comparable sales sold from June 2012 to September 2013 for prices ranging from \$115,000 to \$500,000 or from \$18.39 to \$97.92 per square foot of building area, including land. The subject's assessment reflects a market value of \$409,500 or \$65.00 per square foot of building area, including land, which is within the range established by the best comparables in this record. However, the Board finds that the appellant's comparable sale #2 is inferior when compared to the subject due to its older age and smaller lot size. The Board also finds that the board of review's comparable #3 is inferior to the subject due to its slab foundation, unlike the subject. However, this comparable does have a larger lot size when compared to the subject. Likewise, the board of review's comparable sale #4 is inferior due to its

smaller building and lot sizes when compared to the subject. However, this comparable's building is significantly newer than the subject. Finally, the Board finds the board of review's sale #2 is the most similar sale contained in this record that also sold the most proximate to the January 1, 2013 assessment date at issue. This comparable sold in February 2013 for \$365,000 for \$69.92 per square foot of building area, including land. After adjusting the comparables for differences when compared to the subject, the Board finds the subject is overvalued. The Board gave less weight to the parties' remaining comparables sales due to their sales occurring greater than 12 months prior to the January 1, 2013 assessment date at issue.

Based on this evidence the Board finds a reduction in the subject's assessment is 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: December 18, 2018



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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