



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

APPELLANT: Jim Grammas
DOCKET NO.: 16-43369.001-R-1
PARCEL NO.: 13-35-400-013-0000

The parties of record before the Property Tax Appeal Board are Jim Grammas, 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: \$11,505
IMPR.: \$55,114
TOTAL: \$66,619

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 2016 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 multi-level, multi-family dwelling with 6,375 square feet of living area, masonry exterior construction, and a three and one-half car, detached garage. The property has an 8,850 square foot site and is located in Jefferson Township, Cook County. The subject is classified as a class 2-11, residential property under the Cook County Real Property Assessment Classification Ordinance.

The appellant raised two issues: an overvaluation and inequity arguments as the bases of the appeal. In support of both arguments, the appellant submitted two grid sheets with information on eight equity comparables along with sales data on four. They are improved with a multi-family dwelling of frame or masonry construction. The improvements ranged in size from 4,616

to 7,305 square feet of living area and in improvement assessments from \$5.61 to \$8.33 per square foot. Four properties sold from June, 2014 to May, 2016 for prices that ranged from \$84.88 to \$111.77 per square foot.

Further, the appellant submitted a copy of an affidavit as well as a copy of the subject's appeal history from the Cook County Assessor's website. The affidavit states that the appellant, Jim Grammas, owns and is the taxpayer of the subject, while the property's appeal history indicates that the owner/appellant is Park Central Management. Moreover, the appellant submitted copies of website printouts of the comparables' sales deed and/or from the Cook County Recorder of Deeds office relating to each sales' details.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$72,692. The subject's assessment reflects a market value of \$726,920 or \$114.03 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In addition, the board of review submitted two grid sheets with equity data on a total of six properties and sales data on five properties. Therefore, as to the overvaluation argument, there was readable descriptive, assessment, and sales data on four comparables over both grid sheets. They are improved with a two-story or a three-story, frame, masonry or stucco, multi-family dwelling. The improvements ranged in age from 11 to 112 years and in size from 3,811 to 7,944 square feet of living area. They sold from September, 2015, to July, 2016, for prices that ranged from \$88.44 to \$297.82 per square foot.

As to the inequity argument, the board of review submitted readable descriptive and assessment data on a total of five comparables. They are improved with a two-story or three-story, masonry, stucco or frame, multi-family dwelling. The improvements ranged: in age from 11 to 126 years; in size from 1,307 to 7,944 square feet of living area; and in assessments from \$6.79 to \$13.27 per square foot of living area. The subject's improvement assessment is \$9.60 per square foot of living area.

The appellant submitted no rebuttal evidence.

Conclusion of Law

Initially 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 comparable sales #1, #3 and #4*. These comparables sold for prices ranging from \$84.88 to \$111.77 per square foot of

living area, including land. The subject's assessment reflects a market value of \$114.03 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. After making adjustments to the comparables for pertinent factors including; but limited to, time of sale, style, age and/or size, the Board finds a reduction in the subject's assessment is justified.

Next, the Board finds that after the above reduction is applied to the subject property, that assessment equity will have been achieved. Therefore, the Board will not further address the appellant's second issue.

Lastly, the Board finds that there was no evidence that the subject was an owner-occupied, residence by the appellant in this appeal. The affidavit's plain verbiage indicated that the appellant in this appeal of an apartment building was the owner and taxpayer, while the appeal history of this apartment building from the Assessor's website, also submitted by the appellant, indicated that the owner/appellant was Park Central Management. Therefore, Section 16-185 of the Property Tax Code does not apply. 31 Ill. Reg. 16222, effective November 26, 2007

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: September 15, 2020



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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