



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

APPELLANT: Brian Basic
DOCKET NO.: 16-43684.001-R-1 through 16-43684.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Brian Basic, 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 **No Change in part and A Reduction in part** 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
16-43684.001-R-1	30-31-302-023-1014	404	1,476	\$1,880
16-43684.002-R-1	30-31-302-023-1018	541	1,246	\$1,787

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 two condominium units within a 35-year old, multi-story, 24-unit condominium building. The property is located in Thornton Township, Cook County and are classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of the overvaluation argument, the appellant submitted a brief requesting a reduction based upon sales data on seven units within the subject property's 24 units. The multiple listing service sheets indicate that the seven units sold from January, 2013 to July, 2016 for unadjusted prices that ranging from \$13,000 to \$19,000 for

a total amount of \$111,074. The appellant argues that the total should be reduced by 10% to account for personal property for an adjusted value of \$99,967. The appellant then applies the percentage of ownership of these seven sales at 26.621% to arrive at a total value of the building of \$375,519.

Next, the appellant's attorney applies the percentage of ownership for each of the subject units of 3.203% and 4.282% to arrive at market values for the subject units of \$12,028 and \$16,080. In addition, the appellant requests that a 10% level of assessment should be applied to this adjusted market value. The appellant did not submit any evidence to indicate that the subject units were owner-occupied.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the two units under appeal of \$4,394. The subject's assessment reflects a market value for the appealed units of \$18,800 and \$25,140 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 one sale within units within the subject's building. This sale relates to the initial unit under appeal. The unit sold on August 24, 2016 for an unadjusted price of \$19,000. The board then applies 3.2030% that represents the ownership percentage of the unit that sold to reflect a full value of the building at \$593,194. Next, the board of review applies the percentage of ownership of the two subject units of 8.6150% to arrive at a full value of these units of \$51,104 resulting in a total assessed value of the two units at \$5,110.

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).

First, the Board finds the best evidence of market value for subject unit PIN-1014 to be its actual sale in August, 2016 for an unadjusted value of \$19,000. This subject sale is supported by the seven sale comparables submitted by the appellant that reflect an upward trend in market values from 2013 to 2016. Therefore, the Board finds: that the appellant failed to disclose this unit's actual sale, that the appellant did not meet its burden as to this subject property, that this subject property is not overvalued, and that the current value is supported after making a slight adjustment for pertinent factors to the unadjusted sale price.

Next, the Board finds that the best evidence of market value for the subject unit PIN-1018 to be seven sale comparables located in the subject's building, that were submitted into evidence by the appellant. These units sold from January, 2013 to July, 2016 for unadjusted prices ranging from \$13,000 to \$19,000 for an unadjusted total of \$111,074. Therefore, the Board will apply the percentage of ownership of these comparables of 26.621% to the unadjusted total to arrive at

a value for the building of \$417,242. In applying the subject second unit's ownership of percentage at 4.282%, the Board finds this subject unit had a value of \$17,866.

At to this subject parcel, the Board finds that in applying the correct level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%, the Board finds the appellant did show by a preponderance of the evidence that this subject property's unit was overvalued, and a reduction is justified to this unit.

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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