



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

APPELLANT: Brian Basic
DOCKET NO.: 16-43796.001-R-1 through 16-43796.032-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 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
16-43796.001-R-1	19-10-326-056-1001	742	5,036	\$5,778
16-43796.002-R-1	19-10-326-056-1002	935	6,349	\$7,284
16-43796.003-R-1	19-10-326-056-1003	732	4,969	\$5,701
16-43796.004-R-1	19-10-326-056-1004	739	5,019	\$5,758
16-43796.005-R-1	19-10-326-056-1005	742	5,036	\$5,778
16-43796.006-R-1	19-10-326-056-1006	732	4,969	\$5,701
16-43796.007-R-1	19-10-326-056-1007	739	4,962	\$5,701
16-43796.008-R-1	19-10-326-056-1008	752	5,102	\$5,854
16-43796.009-R-1	19-10-326-056-1009	739	5,019	\$5,758
16-43796.010-R-1	19-10-326-056-1010	933	6,332	\$7,265
16-43796.011-R-1	19-10-326-056-1011	729	4,953	\$5,682
16-43796.012-R-1	19-10-326-056-1012	737	5,003	\$5,740
16-43796.013-R-1	19-10-326-056-1013	742	5,036	\$5,778
16-43796.014-R-1	19-10-326-056-1014	727	4,936	\$5,663
16-43796.015-R-1	19-10-326-056-1015	737	5,003	\$5,740
16-43796.016-R-1	19-10-326-056-1016	742	5,036	\$5,778
16-43796.017-R-1	19-10-326-056-1017	749	5,086	\$5,835
16-43796.018-R-1	19-10-326-056-1018	938	6,365	\$7,303
16-43796.019-R-1	19-10-326-056-1019	734	4,986	\$5,720
16-43796.020-R-1	19-10-326-056-1020	734	4,986	\$5,720
16-43796.021-R-1	19-10-326-056-1021	756	5,135	\$5,891
16-43796.022-R-1	19-10-326-056-1022	734	4,986	\$5,720
16-43796.023-R-1	19-10-326-056-1023	734	4,986	\$5,720
16-43796.024-R-1	19-10-326-056-1024	754	5,119	\$5,873

16-43796.025-R-1	19-10-326-056-1025	749	5,086	\$5,835
16-43796.026-R-1	19-10-326-056-1026	945	6,415	\$7,360
16-43796.027-R-1	19-10-326-056-1027	739	5,019	\$5,758
16-43796.028-R-1	19-10-326-056-1028	732	4,969	\$5,701
16-43796.029-R-1	19-10-326-056-1029	756	5,135	\$5,891
16-43796.030-R-1	19-10-326-056-1030	737	5,003	\$5,740
16-43796.031-R-1	19-10-326-056-1031	732	4,969	\$5,701
16-43796.032-R-1	19-10-326-056-1032	756	5,079	\$5,835

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 32 condominium units within multi-story buildings. The property is located in Lake Township, Cook County and each unit is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

Initially, the appellants' pleadings indicated a "rollover" request with a recent appraisal indicated as the submitted evidence. However, the appellants submitted only multiple listing sheets regarding sales within the subject's condominium complex as well as a grid sheet summarizing some of the sales data. In addition, the petition requested a "rollover" of the assessments attributed to each condominium under the Board's 2015 decision for the subject units. To this latter argument, the appellants' failed to cite the appropriate law and did not provide evidence that each unit was owner-occupied. In contrast, the disclosed appellant on the pleadings indicated that one individual owns all of the 32 condominium units.

Secondly, the appellants' appeal is based on overvaluation without the submission of an appraisal. In support of the overvaluation argument, the appellant submitted a brief requesting a reduction based upon sales data relating to 10 units located within the subject property's 32 units. The multiple listing service sheets indicate that the 10 units sold from November, 2011 to October, 2015 for unadjusted prices that ranging from \$41,000 to \$75,000 for a total amount of \$534,000. The appellant argues that the total value should be reduced by 10% to account for personal property for an adjusted value of \$480,600. The appellant then applies the percentage of ownership of these 10 sales or 30.17% to arrive at a total value of the building of \$1,592,973.

Next, the appellant's attorney applies the percentage of ownership for each of the subject units that range from 2.94% to 3.86% in order to arrive at market values for the subject units.

However, that data was undisclosed by the appellants' attorney. The last column of the appellants' analysis reflects a desired assessment for each PIN.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the 2018 tax year for the 32 units under appeal of \$233,960. The subject's assessment reflects a 2018 market value for the appealed units of \$2,339,600 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, initially, the board of review submitted a condominium analysis for each condominium under appeal. In addition, the board of review presented two other pages of analysis with sales data on seven units within the subjects' building, five of which were also used in the appellants' analysis. These units sold from March, 2014 to October, 2016 for unadjusted prices from \$51,000 to \$85,000. The board then applies the percentage of interest of the units sold of 21.1100% to reflect a full value of the building at \$2,259,592. Next, the board of review determined the total assessed value of these 32 units at \$225,959.

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 that the appellants have not met the burden of proof in this appeal and that a reduction in assessment is not warranted.

In totality, the parties submitted data and analysis on sales located within the subject property. While the appellants used 10 sales, the Board accorded diminished weight to five sales due to the distance in sale dates from 2011 to 2012 being less than relevant for this 2016 property tax appeal. The Board finds that the appellants' remaining five sales were also used within the board of review's analysis.

The Board finds the remaining seven sales, five of which were jointly submitted by the parties with two additional sales used by the board of review, were actually the basis for the board of review's condominium analysis. Therefore, the Board finds that the board of review's analysis using a total of seven sales within the subject's complex was the best evidence of market value in the record. The board of review used units sold from March, 2014 to October, 2016 for unadjusted prices from \$51,000 to \$85,000. The board of review then applies the percentage of interest of the units sold of 21.1100% to reflect a full value of the building at \$2,259,592. Next, the board of review determined the total assessed value for these 32 units at \$225,959.

Thereby, the Board finds that the best evidence of market value for the subject units was submitted in the board of review's analysis, which supports each condominium unit's current assessment. Further, the Board finds that the appellants did not show by a preponderance of the

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evidence that these condominium units were overvalued, and that a reduction in assessment is not justified to these units.

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:

April 20, 2021



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

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