



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

APPELLANT: Philip Partenanch
DOCKET NO.: 17-26963.001-R-1
PARCEL NO.: 22-32-212-007-0000

The parties of record before the Property Tax Appeal Board are Philip Partenanch, 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: \$1,240
IMPR.: \$35,170
TOTAL: \$36,410

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 2017 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 townhome of masonry exterior construction with 2,474 square feet of living area. The dwelling is approximately 12 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace, and a two-car garage.¹ The property has a 2,158 square foot site and is located in Lemont, Lemont Township, Cook County. The subject is classified as a class 2-95 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 information on 19 comparable sales which area located within the same

¹ There are discrepancies in both parties' grid analyses regarding the basement area and number of fireplaces for the subject property. The Board finds the best description of the subject property was provided in the grid analysis provided by the board of review, and these discrepancies will not impact the Board's decision.

neighborhood code as the subject property. The comparables have lots ranging in size from 2,012 to 3,486 square feet of land area. The comparables are similar class 2-95 dwellings of masonry exterior construction ranging in size from 1,724 to 2,474 square feet of living area. The dwellings range in age from 12 to 16 years old. The comparables are described in the appellant's grid analysis as having a "Craw and Formal Rec. Room" or a "Full and Unfinished" basement area. Each comparable has central air conditioning and a two-car garage, and 18 comparables each have one fireplace. The comparables sold from June 2014 to October 2017 for prices ranging from \$270,000 to \$367,000 or from \$123.28 to \$168.70 per square foot of living area, including land.

Based on this evidence the appellant requested that the subject's assessment be reduced to \$36,410. The requested assessment would reflect a total market value of \$364,100 or \$147.17 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%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$38,053. The subject's assessment reflects a market value of \$380,530 or \$153.81 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 support of its contention of the correct assessment the board of review submitted information on four comparable properties with equity data and one of which also sold. The comparables equity data will not be included in the Board's analysis as it is not responsive to the appellant's overvaluation argument.

The board of review comparable sale #3 is located within the same neighborhood code and the same block as the subject. The comparable has a lot size of 2,158 square feet of land area and is improved with a similar class 2-95, two-story dwelling of masonry exterior construction with 2,164 square feet of living area. The dwelling is 12 years old and has a full unfinished basement, central air conditioning, one fireplace, and a two-car garage. The comparable sold in June 2016 for \$365,000 or \$168.67 per square foot of living area, including land. Based on this evidence, the board of review requested that the subject's assessment be confirmed.

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.

Both parties submitted a total of 20 comparable sales for the Board's consideration. The Board finds the best evidence of market value are the appellant's comparable sales #1, #4, #5, #7, and #10 because they are located in the subject's same neighborhood code and are practically identical to the subject in every aspect. Additionally, these comparables also sold within a one-

year period of the January 1, 2017 assessment date at issue. These five comparables sold from June 2016 to October 2017 for prices ranging from \$305,000 to \$365,000 or from \$123.28 to \$147.53 per square foot of living area, including land. The subject's assessment reflects a market value of \$380,530 or \$153.81 per square foot of living area, including land, which falls above the range established by the best comparable sales in this record. The Board gives less weight to the appellant's remaining comparable sales along with the board of review comparable sale #3 due to their dissimilar dwelling sizes when compared to the subject and/or their sale dates occurring less proximate in time to the January 1, 2017 assessment date at issue. In conclusion, based on the appellant's overvaluation argument, 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: May 18, 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

AGENCY

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Philip Partenanch, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602