



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

APPELLANT: Elizabeth Kowalczuk
DOCKET NO.: 17-26972.001-R-1
PARCEL NO.: 23-10-209-013-1010

The parties of record before the Property Tax Appeal Board are Elizabeth Kowalczuk, 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:

LAND: \$2,855
IMPR.: \$15,666
TOTAL: \$18,521

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 residential condominium unit that is located in a multi-story condominium building that is approximately 19 years old and has 136 units. The property has a .95% ownership interest in the condominium.¹ The property has a 364,327 square foot site and is located at 9190 Del Prado Drive #2S in Palos Hills, Palos Township, Cook County. The subject is classified as a class 2-99 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's attorney submitted a supplemental brief requesting a reduction based on the sales data of 21 units located within the subject's condominium building. The Multiple Listing

¹ Both parties differ as to the ownership interest of the subject's condominium unit. The Board finds the board of review presented the best evidence of the individual ownership interests for each of the units located in the building.

Service listing sheets indicated that 21 units sold from February 2014 to April 2017 for prices ranging from \$120,100 to \$184,000 for a total consideration of \$3,165,700. The appellant argues that the total value should be reduced by 10% to account for personal property for an adjusted value of \$2,849,130. The appellant then applied the 15.54% of ownership of the 21 sales to arrive at a total value of the building of \$18,334,170. The appellant then applied the subject's purported percentage of ownership of .74% to arrive at a market value for the subject unit of \$135,673. The appellant's attorney requested the assessed value of the subject's unit be reduced to \$13,567, when applying the statutory level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject unit's total assessment for the 2017 tax year of \$18,521. The subject's assessment reflects a 2017 market value for the subject's appealed unit of \$185,210 when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The board of review submission included a document entitled Condominium Analysis Results for 2017, which disclosed the ownership percentage of each unit in the condominium, including the subject property.

In support of its contention of the correct assessment, the board of review submitted a condominium analysis prepared by William Grossi, an analyst with the Cook County Board of Review. The analysis included sales data on 15 units within the subject's building, 11 of which are also used in the appellant's analysis. The units sold from March 2015 to May 2017 for prices ranging from \$125,000 to \$200,000 for a total consideration of the units sold at \$2,295,740. Dividing the total adjusted consideration by the percentage of interest of ownership in the condominium for the units that sold of 9.69% indicated a full value for the condominium property of \$23,691,950. The analyst next applied the subject's percentage of ownership of .95% to arrive at the full value of \$225,074 for the subject's unit. The analysis determined the total assessed value of the subject's unit to be \$22,507, after applying the statutory level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%, which is greater than the subject's current assessment. Based on this analysis, the board of review requested confirmation of the subject's assessment.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted data and analyses on a total of 25 comparable sales located within the subject property. The Board gives less weight to the appellant's 6 sales occurring in 2014 which are less relevant to the January 1, 2017 assessment date at issue.

The Board finds the best evidence of market value to be the remaining 19 most recent sales, 11 of which are jointly submitted by both parties with eight additional sales of four sales by each party. The sales occurred from January 2015 to May 2017 which is closer to the 2017 assessment date at issue. Taking the sum of the sale prices of the 19 most recent sales of \$2,966,250 divided by the 13.11% total percentage of ownership of the units sold (as shown for each unit in the board of review evidence) results in an estimated total full value for the subject condominium of \$22,625,858. Using the subject's percentage of ownership of .95%, the subject unit would have an estimated market value of \$214,946 based on the unit's sold. The subject's current assessment reflects a market value of \$185,210, which falls below the market value reflected in the Board's analysis of the 19 most recent sale comparables in this record. Based on this record, the Board finds that the appellant has not proven, by a preponderance of the evidence that the subject is overvalued, and a reduction in the subject's assessment is not warranted.

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

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