



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

APPELLANT: Waleed Hasan
DOCKET NO.: 17-27193.001-R-1
PARCEL NO.: 23-24-203-037-0000

The parties of record before the Property Tax Appeal Board are Waleed Hasan, 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: \$3,630
IMPR.: \$45,442
TOTAL: \$49,072

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 multi-family dwelling of masonry construction with 6,084 square feet of living area. The dwelling is 48 years old. Features of the home include a full basement apartment and central air conditioning. The property has a 6,050 square foot site and is located in Worth, Palos Township, Cook County. The subject is classified as a class 2-11 multi-family property under the Cook County Real Property Assessment Classification Ordinance.

The appellant filed an appeal marking a recent appraisal as the basis. The appellant was notified by the Property Tax Appeal Board that the appeal was incomplete, due to an insufficient number of copies of evidence, the appeal was not signed and dated, and was granted a 30-day extension to complete the appeal. The appellant responded by submitting an amended appeal based on assessment equity, that included an assessment grid containing information on four equity

comparables.¹ The properties were not located within the same neighborhood code as the subject property. The comparables were improved with multi-level dwellings of frame or frame and masonry construction that ranged in size from 1,316 to 1,401 square feet of living area and ranged in age from 45 to 65 years old. The comparables had other features with varying degrees of similarity to the subject. The comparable properties had improvement assessments ranging from \$10,869 to \$14,723 or from \$8.26 to \$10.61 per square foot of living area.

Based on this evidence, the appellant requested that the subject's improvement assessment be lowered to \$19,229.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,072. The subject property has an improvement assessment of \$45,442 or \$7.47 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted a grid analysis containing four comparable properties that were located within the same neighborhood code as the subject property. Comparable #4 was located on the same block as the subject. The comparables were improved with multi-family dwellings of masonry construction that ranged in size from 4,384 to 4,908 square feet of living area and ranged in age from 44 to 47 years old. The comparables had other features with varying degrees of similarity to the subject. The comparable properties had improvement assessments ranging from \$36,339 to \$40,616 or from \$7.97 to \$8.44 per square foot of living area.

Based on this evidence the board of review requested that the subject's assessment be confirmed.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 eight equity comparable properties for the Board's consideration. The Board gave less weight to the appellant's comparables due to their dissimilar property classification, location, style and features, when compared to the subject. The Board finds the board of review's comparables were more similar to the subject in property classification, location, style, age and features, but smaller in dwelling size. These comparables had improvement assessments that ranged from \$7.97 to \$8.44 per square foot of living area. The subject's improvement assessment of \$7.47 per square foot of living area falls below the range established by the best comparables in this record. Based on this record the Board finds the

¹ The Board finds the appellant's evidence for this appeal is the same evidence that was submitted under Docket No. 17-27125.001-R-1.

appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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: December 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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