



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

APPELLANT: Mike Rumaneh
DOCKET NO.: 17-28338.001-R-1
PARCEL NO.: 16-29-109-037-0000

The parties of record before the Property Tax Appeal Board are Mike Rumaneh, 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: \$3,685
IMPR.: \$7,058
TOTAL: \$10,743

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 one-story dwelling of frame and masonry exterior construction with 803 square feet of living area. The dwelling is approximately 94 years old. Features of the home include an unfinished basement and a 2-car garage. The property has a 3,780 square foot site and is located in Berwyn, Berwyn Township, Cook County. The subject is classified as a class 2-02 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 four comparable sales that were located within the same neighborhood code as the subject. The comparables each have lots containing 3,780 square feet of land area and are improved with similar class 2-02 dwellings of frame or masonry exterior construction. The comparables range in size from 726 to 920 square feet of living area and range in age from 95 to 105 years old. Each comparable has a full basement, two of which have a

recreation room. Two comparables each have a 2-car garage and one home has a 2.5-car garage. The comparables sold from May 2016 to June 2017 for prices ranging from \$82,000 to \$117,500 or from \$106.20 to \$130.85 per square foot of living area, including land. The appellant also submitted deeds associated with the sales of each comparable property.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$9,583. The requested assessment would reflect a total market value of \$95,830 or \$119.34 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The appellant submitted the final Cook County Board of Review assessment notice disclosing the 2017 assessment for the subject property to be \$10,743. The subject's assessment reflects a market value of \$107,430 or \$133.79 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 one comparable sale that was located within the same neighborhood code as the subject property.¹ The comparable has a lot size containing 3,780 square feet of land area and is improved with a similar one-story dwelling of masonry exterior construction. The dwelling contains 887 square feet of living area and is approximately 96 years old. The comparable has a full unfinished basement and a 2-car garage. The comparable sold in March 2015 for a price of \$118,000 or \$133.03 per square foot of living area, including land. The board of review also submitted color photographs of the subject and the comparable property.

Based on this evidence, 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 a total of five comparable sales with varying degrees of similarity to the subject to support their respective positions before the Property Tax Appeal Board. The Board gave less weight to the board of review comparable sale based on its sale date in March 2015, a date less proximate in time to the subject's January 1, 2017 assessment date at issue and therefore less likely to be reflective of the subject's market value than the comparables submitted by the appellant.

¹ The board of review also submitted three equity comparables which were not responsive to the appellant's overvaluation argument and, therefore, will not be considered by the Board.

The Board gave reduced weight to appellant's comparable #1 as it lacks a garage which is a feature of the subject property.

The Board finds the best evidence of market value to be appellant's comparables #2, #3 and #4 which were most similar to the subject in terms of location, design, age, dwelling size, lot size, and most features. These three most similar comparables in the record sold between May 2016 and April 2017 for prices ranging from \$82,000 to \$117,500 or from \$106.20 to \$130.85 per square foot of living area, including land, with the best comparable in the record being appellant's comparable #2 which sold in February 2017 for \$117,500 or \$130.85 per square foot of living area, land included. The subject's assessment reflects a market value of \$107,430 or \$133.79 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record on an overall value basis and slightly above the range on a per square foot basis. However, the subject's slightly higher per square foot price appears justified given the well-established principle of economies of scale and the subject's smaller dwelling size relative to the best comparable sale in the record. Based on this evidence and after considering adjustments to the comparables for differences when compared to the subject, the Board finds that the appellant did not prove by the preponderance of the evidence that the subject property is overvalued and, thus, 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: 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

AGENCY

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

APPELLANT

Mike Rumaneh, 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