



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

APPELLANT: Gina Will  
DOCKET NO.: 17-30719.001-R-1  
PARCEL NO.: 09-34-402-009-0000

The parties of record before the Property Tax Appeal Board are Gina Will, 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:** \$ 5,850  
**IMPR.:** \$22,429  
**TOTAL:** \$28,279

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 consists of a one-story dwelling of masonry exterior construction with 1,053 square feet of living area. The dwelling is 62 years old. Features of the home include a full basement with a formal recreation room, a fireplace and a one-car garage. The property has a 6,500 square foot site and is located in Park Ridge, Maine Township, Cook County. The subject is classified as a class 2-03 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 had lots ranging in size from 5,791 to 7,313 square feet of land area and were improved with similar class 2-03 dwellings of frame, masonry

or frame and masonry exterior construction. The comparables ranged in size from 1,599 to 1,789 square feet of living area and ranged in age from 55 to 91 years old. Three comparables had either full or partial unfinished basements and one had a crawl-space foundation. Two comparables had central air conditioning, three comparables each had a fireplace and three comparables have either one-car or two-car garages. The comparables sold from January to November 2016 for prices ranging from \$250,000 to \$380,000 or from \$152.53 to \$212.41 per square foot of living area, including land. The comparables have total assessments ranging from \$29,250 or from \$36,892 which, at the Ordinance level of 10%, reflect market values ranging from \$292,500 to \$368,920 and depict ratios of recent sales prices ranging from 9.7% to 14%.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$19,990. The requested assessment would reflect a total market value of \$199,900 or \$189.84 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 board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$28,279. The subject's assessment reflects a market value of \$282,790 or \$268.56 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 sales along with information on the sale of the subject.

Each of the comparable sales were located within the same neighborhood code as the subject and one was within the subarea. The comparables had lots ranging in size from 6,250 to 8,850 square feet of land area and were improved with similar one-story dwellings of stucco, masonry or frame and masonry exterior construction. The comparables ranged in size from 1,014 to 1,234 square feet of living area and were 56 to 96 years old. Each comparable has a full or partial basement, two of which have finished areas. Two dwellings have central air conditioning, each comparable has a fireplace and either a one-car or a two-car garage. The comparables sold from June 2014 to July 2016 for prices ranging from \$340,000 to \$480,000 or from \$275.53 to \$415.58 per square foot of living area, including land. The comparables have total assessments ranging from \$22,208 or from \$33,706 which, at the Ordinance level of 10%, reflect market values ranging from \$222,080 to \$337,060 and depict ratios of recent sales prices ranging from 5.35% to 9.5%.

In addition, the board of review reported that the subject property sold in June 2015 for \$327,000 or \$310.54 per square foot of living area, including land. The subject's current total assessment reflects a market value of \$282,790 or a ratio of 8.6% of the recent purchase price. In an accompanying Supplemental Brief, the board of review noted that the appellant did not disclose this recent purchase price and furthermore asserted that the best indication of market value was the subject's recent arm's length sale. In support and within the brief, the board of review included documentation from the Cook County Recorder of Deeds' website depicting that the subject transferred via Warranty Deed from Frank and Carmelina Magnelli to Adam and Gina Will.

Based on this evidence the board of review requested an increase in the subject's assessment to \$32,700 in order to reflect the subject's recent purchase price at the 10% level of 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 based on the market value evidence of record that a reduction in the subject's assessment is not warranted.

The parties submitted evidence of eight comparable sales along with the recent sale of the subject property to support their respective positions before the Property Tax Appeal Board. The Board has given little weight to the appellant's comparable sales as each dwelling is significantly larger and/or older than the subject dwelling that contains 1,053 square feet of living area. The Board has also given reduced weight to board of review comparables #3 and #4 which each sold in 2014, a date more remote in time to the valuation date at issue of January 1, 2017 and thus less likely to be indicative of the subject's estimated market value as of the lien date than other market value evidence in the record.

The Board finds the best evidence of market value to be board of review comparable sales #1 and #2 along with evidence of the June 2015 purchase price for the subject property. The two most similar comparable sales presented by the board of review were similar to the subject in age, design, size, foundation and garage amenity. These two comparables sold in April and July 2016 for \$340,000 and \$480,000 or for \$275.53 and \$415.58 per square foot of living area, including land, respectively, with assessments of 9.5% and 5.4%, respectively, of these recent purchase prices. The subject property was purchased by the appellant in June 2015 for \$327,000 or \$310.54 per square foot of living area, including land. The subject's current total assessment reflects a market value of \$282,790 or \$268.56 per square foot of living area, including land, or an assessment that reflects 8.6% of its recent purchase price, which is supported by the best most recent comparable sales in the record. Based on this evidence and after considering the best evidence of market value as reflected both by the best comparable sales in the record and by the subject's June 2015 purchase price, the Board finds that neither an increase nor a decrease in the subject's assessment is 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: March 16, 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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