



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

APPELLANT: William Haddad
DOCKET NO.: 17-32643.001-R-1
PARCEL NO.: 18-13-221-034-0000

The parties of record before the Property Tax Appeal Board are William Haddad, 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: \$3,565
IMPR.: \$19,109
TOTAL: \$22,674

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 dwelling of masonry exterior construction with 2,745 square feet of living area. The dwelling is 50 years old. Features of the home include a full basement with a formal recreation room and a two-car garage. The property has a 6,200 square foot site and is located in Summit, Lyons Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity with respect to the improvement as the bases of the appeal. In support of the overvaluation argument the appellant submitted information on four comparable sales with the same neighborhood code as the subject. The comparables have sites that range in size from 3,269 to 6,250 square feet of land area. The comparables are improved with class 2-11 dwellings of masonry exterior construction that range

in size from 2,152 to 2,600 square feet of living area and in age from 53 to 69 years old. Three comparables each have a partial or a full basement with two having an apartment or a formal recreation room. One comparable has a concrete slab foundation. One comparable has central air conditioning. Each comparable has a 2-car or a 2.5-car garage. The sales occurred from April 2015 to September 2017 for prices ranging from \$148,000 to \$180,199 or from \$68.77 to \$74.77 per square foot of living area, land included.

In support of the inequity argument, the appellant submitted information on four equity comparables that have the same neighborhood code and classification code as the subject. The comparables are described as two, 2-story and two, 1.5-1.9-story dwellings of frame, masonry, or frame and masonry exterior construction that range in size from 2,208 to 2,400 square feet of living area and in age from 99 to 109 years old. Three comparables have full basements with two having an apartment or a formal recreation room. One comparable has a crawl space foundation. Each comparable has a 2-car or 2.5-car garage. The comparables have improvement assessments ranging from \$8,275 to \$14,595 or from \$3.50 to \$6.08 per square foot of living area.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$18,224, reflecting a market value of \$182,240 or \$66.39 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 request would lower the subject's improvement assessment to \$14,659 or \$5.34 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$22,674. The subject's assessment reflects a market value of \$226,740 or \$82.60 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 subject has an improvement assessment of \$19,109 or \$6.96 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same neighborhood code and classification code as the subject. The comparable sales have sites ranging in size from 3,690 to 3,937 square feet of land area and are improved with two-story dwellings of masonry exterior construction that range in size from 2,431 to 2,736 square feet of living area. The dwellings are 54 to 63 years old. The comparables each have a full basement with three having a formal recreation room. Each comparable has a two-car garage. Comparable #3 sold in June 2016 for \$210,000 or for \$86.24 per square foot of living area, including land. The comparables have improvement assessments ranging from \$17,975 to \$19,991 or from \$7.31 to \$8.07 per square foot of living area.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part 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 record contains five comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparable sales #1, #2 and #3 due to their dated sales in 2015 which were less proximate in time to the subject's January 1, 2017 assessment than the other sales in the record and/or having a significantly smaller dwelling size when compared to the subject.

The Board finds the best evidence of the subject's market value to be appellant's comparable #4 and board of review comparable #3 which are more similar to the subject in dwelling size and sold proximate in time the January 1, 2017 assessment date. However, both comparables still have smaller dwelling sizes, lot sizes, and are older in age when compared to the subject. The sales occurred in September 2017 and June 2016 for prices of \$180,199 and \$210,000 or for \$69.31 and \$86.24 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$226,740 or \$82.60 per square foot of living area, including land, which is bracketed on a price per square foot basis by the two best comparable sales in this record but above on an overall basis. The subject's higher overall value is justified when considering the subject's larger dwelling size, lot size and younger age. After considering adjustments to the comparables for any differences including dwelling size, lot size and age when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported.

The appellant also argued assessment inequity as an alternative 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. The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains eight equity comparables for the Board's consideration. The Board gave less weight to the appellant's comparables due to their significantly older ages when compared to the subject.

The Board finds the best evidence of assessment equity to be the board of review comparables. These comparables overall are most similar to the subject in location, dwelling size, design, age and most features. The comparables have improvement assessments ranging from \$17,975 to \$19,991 or from \$7.31 to \$8.07 per square foot of living area. The subject has an improvement assessment of \$19,109 or \$6.96 per square foot of living area, which falls below the range established by the best comparables in this record on a square foot basis. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is supported. Therefore, no reduction in the subject's improvement 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

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