



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

APPELLANT: Renata Germann
DOCKET NO.: 17-32665.001-R-1
PARCEL NO.: 18-25-401-041-0000

The parties of record before the Property Tax Appeal Board are Renata Germann, 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 ***a reduction*** 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: \$2,906
IMPR.: \$11,394
TOTAL: \$14,300

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 ranch dwelling of brick and siding exterior construction with 1,152 square feet of living area. The appraiser reported that there is an additional 512 square foot unfinished shell in the front of the dwelling, as the exterior is finished and the interior has studs only. The dwelling is approximately 66 years old. Features of the home include central air conditioning and a detached three-car garage. The property has a 7,700 square foot site and is located in Bridgeview, Lyons 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 an appraisal estimating the subject property had a market value of \$115,000 as of December 26, 2016. The appraisal was prepared by Harry J. Ventimiglia, an Illinois Certified Residential Real Estate Appraiser. In estimating the market value of the subject

property, the appraiser developed the sales comparison approach to value using three sales located within .81 miles of the subject that sold from December 2015 to September 2016 for prices ranging from \$82,000 to \$128,000. The comparables have sites that range in size from 6,600 to 11,251 square feet of land area. The comparables are improved with ranch dwellings of brick or siding exterior construction ranging in size from 808 to 1,026 square feet of living area that were 56 to 64 years old. Two comparables have central air conditioning and each comparable has a two-car garage. The appraiser adjusted the comparables for differences from the subject property to arrive at adjusted prices ranging from \$89,300 to \$120,300. Based on these sales the appraiser arrived at an estimated market value of \$115,000 as of December 26, 2016.

The appellant also submitted a copy of the decision of the board of review disclosing the subject property had a total assessment of \$18,389 reflecting a market value of \$183,890 or \$159.63 per square foot of living area, including land, when using the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The appellant requested the subject's assessment be reduced to \$11,500 to reflect the appraised value.

The board of review did not submit its "Board of Review Notes on Appeal" nor any evidence in support of its assessed valuation of the subject property.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the only evidence of market value to be the appraisal submitted by the appellant estimating the subject had a market value of \$115,000 as of December 26, 2016. The appraiser analyzed three comparable sales and made adjustments in order to arrive at an estimate of the subject's market value. However, the Board finds it problematic that the appraiser failed to adjust the comparables due to their lack of the 521 square feet of unfinished building area that the subject has. In addition, the appraiser's comparable #1 has a 30% smaller dwelling than the subject. The Board finds these factors undermine the appraiser's conclusion of value. As a result, the Board will instead examine the raw sales found in the appraisal.

The Board finds the best evidence of market value to be the appraiser's comparable sales #2 and #3. These properties are relatively similar to the subject in location, site size, design and features, though neither comparable has the 521 square foot unfinished building area like the subject. These properties sold in September and February 2016 for prices of \$117,000 and \$128,000 or for \$114.15 and \$128.00 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$183,890 or \$159.63 per square foot of living area, land included, which is above the two best sales in the record. The board of review did not submit any evidence in support of its assessment of the subject property as required by section 1910.40(a) of the rules of the Property Tax Appeal Board. 86 Ill.Admin.Code §1910.40(a) &

§1910.69(a). The Board has examined the evidence submitted by the appellant and finds that after considering adjustments to the comparables for differences when compared to the subject, a reduction in the assessed valuation of the subject property is 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: 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

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