



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

APPELLANT: Mike Sahil
DOCKET NO.: 17-33771.001-R-1
PARCEL NO.: 16-13-309-013-0000

The parties of record before the Property Tax Appeal Board are Mike Sahil, 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: \$3,281
IMPR.: \$17,269
TOTAL: \$20,550

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, two-unit apartment building with 2,658 square feet of living area and masonry exterior construction. The dwelling is approximately 115 years old and features a full unfinished basement. The property has a 3,125 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on both overvaluation and assessment equity. The subject's land assessment was not challenged.

In support of the overvaluation argument the appellant submitted information on four comparable sales located in the same neighborhood code as the subject property. The comparables have sites with 3,125 or 3,150 square feet of land area and are improved with class

2-11 dwellings of frame or masonry exterior construction that range in size from 1,768 to 3,124 square feet of living area. The dwellings range in age from 112 to 127 years old. Three comparables have a concrete slab foundation and one comparable has an unfinished basement. Two comparables each have a two-car garage and one comparable has three fireplaces. The comparables sold from April 2016 to November 2017 for prices ranging from \$40,500 to \$215,000 or from \$22.91 to \$69.25 per square foot of living area, land included.

As an alternate basis of the appeal, the appellant contends assessment inequity with respect to the subject's improvement assessment. In support of the equity argument, the appellant submitted information on nine comparables located in the same neighborhood code as the subject property. The comparables are improved with class 2-11 dwellings of frame exterior construction that range in size from 2,520 to 2,866 square feet of living area. The dwellings range in age from 108 to 123 years old. Each comparable has a concrete slab foundation and three comparables each have a one-car garage. The properties have improvement assessments that range from \$13,596 to \$17,011 or from \$5.15 to \$5.94 per square foot of living area.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$14,824. The requested assessment reflects a total market value of \$148,240 or \$55.77 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 \$11,533 or \$4.34 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 \$20,550. The subject's assessment reflects a market value of \$205,500 or \$77.31 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, on market value grounds, the board of review submitted information on four comparable sales located within 0.25 of a mile from the subject property. The comparables have sites that range in size from 2,750 to 4,500 square feet of land area and are improved with class 2-11 dwellings of masonry exterior construction that range in size from 2,416 to 2,466 square feet of living area. The dwellings range in age from 103 to 127 years old. Each comparable has a basement with two having finished area. One comparable has two fireplaces and one comparable has a one-car garage. The comparables sold from January to September 2016 for prices ranging from \$190,000 to \$225,000 or from \$78.64 to \$91.69 per square foot of living area, land included.

With respect to the uniformity argument, the board of review submitted four equity comparables located in the same neighborhood code as the subject property. The comparables are improved with class 2-11 dwellings of masonry exterior construction that range in size from 2,490 to 2,688 square feet of living area. The dwellings range in age from 112 to 127 years old. Three comparables have unfinished basements, one comparable has a concrete slab foundation and one comparable has two fireplaces. The comparables have improvement assessments ranging from \$17,407 to \$17,693 or from \$6.50 to \$7.01 per square foot of living area.

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

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 parties submitted eight comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparables #1, #3 and #4 and board of review comparables #1 and #3 which differ from the subject in having either a concrete slab foundation or finished basement compared to the subject's unfinished basement.

The Board finds the best evidence of market value to be appellant's comparable #2 and board of review comparables #2 and #4 which are relatively similar to the subject in location, design and features. These comparables sold from June 2016 to May 2017 for prices ranging from \$159,000 to \$206,000 or from \$69.25 to \$84.70 per square foot of living area, including land. The subject's assessment reflects a market value of \$205,500 or \$77.31 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. After considering adjustments to the comparables for differences from the subject, the Board finds a reduction in the subject's assessment, based on overvaluation, is not justified.

The taxpayer also contends 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 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, based on inequity is not warranted.

The parties submitted thirteen equity comparables for the Board's consideration. The Board gave less weight to the appellant's comparables and board of review comparable #4 due to their concrete slab foundations when compared to the subject's unfinished basement.

The Board finds the best evidence of equity with respect to the subject's improvement assessment to be board of review comparables #1, #2 and #3 which are similar to the subject in location, size, design and most features. These comparables have improvement assessments ranging from \$17,407 to \$17,463 or from \$6.50 to 7.01 per square foot of living area. The subject's improvement assessment of \$17,269 or \$6.50 per square foot of living area falls within the range on an overall value basis and at the low end of the per square foot range established by the best equity comparables in the record. Therefore, after considering adjustments to the

comparables for differences when compared to the subject, the Board finds the subject's assessment is supported and a reduction, based on assessment equity, 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: 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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