



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

APPELLANT: Frank Alexis
DOCKET NO.: 17-42141.001-R-1
PARCEL NO.: 04-34-415-030-0000

The parties of record before the Property Tax Appeal Board are Frank Alexis, 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: \$10,143
IMPR.: \$63,596
TOTAL: \$73,739

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 frame and masonry exterior construction with 3,881 square feet of living area. The dwelling is approximately 63 years old. Features of the home include a full basement with finished area, central air conditioning, a fireplace and a two-car garage. The property has a 9,436 square foot site and is located in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends both overvaluation and assessment inequity with respect to the subject's improvement as the bases of the appeal. In support of the overvaluation argument, the appellant submitted information on three comparable sales located within the same neighborhood code as the subject property. The comparables have sites that range in size from 7,614 to 17,082 square feet of land area. The comparables are improved with similar class 2-06 dwellings of masonry or

stucco exterior construction ranging in size from 2,928 to 3,590 square feet of living area. The comparables range in age from 63 to 70 years old. One comparable has a crawl space foundation and two comparables each have a full or partial basement with finished area. Each comparable has central air conditioning and one or two fireplaces. Two comparables each have a two-car garage. The comparables sold in July 2015 and June 2017 for prices ranging from \$485,179 to \$668,000 or from \$158.77 to \$191.24 per square foot of living area, land included.

In support of the inequity argument, the appellant provided information on four comparable properties that were located within the same neighborhood code as the subject property and within .41 of a mile from the subject. The comparables are similar class 2-06 two-story or three-story dwellings of masonry or frame and masonry exterior construction ranging in size from 3,207 to 3,624 square feet of living area. The dwellings range in age from 63 to 73 years old. The comparables each feature a full or partial basement with finished area and central air conditioning. Three comparables each have one or two fireplaces and three comparables each have a two-car garage. The comparables have improvement assessments that range from \$38,637 to \$61,608 or from \$10.76 to \$17.04 per square foot of living area.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$69,402, reflecting a market value of \$694,020 or \$178.83 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 \$59,259 or \$15.27 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 \$80,056. The subject's assessment reflects a market value of \$800,560 or \$206.28 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 \$69,913 or \$18.01 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on six comparable properties located within the same neighborhood code as the subject property, two of which are within .25 of a mile from the subject and two are within the subject's subarea.¹ Sales data was provided on three of the comparables. Board of review comparable #5 is the same property as the appellant's equity comparable #3. The comparables have sites that range in size from 7,860 to 15,093 square feet of land area. The comparables are improved with similar class 2-06 two-story dwellings of frame or frame and masonry exterior construction ranging in size from 2,350 to 3,415 square feet of living area. The dwellings range in age from 63 to 75 years old. Each comparable features a full or partial basement, three of which have finished area. Each comparable has central air conditioning, four comparables each have a fireplace and each comparable has either a one-car, a two-car or a three-car garage. The comparables have improvement assessments that range from \$45,256 to \$66,017 or from \$16.27 to \$21.13 per square foot of living area. Comparables #1 through #3 sold from August 2014 to September 2016 for prices ranging from \$722,000 to \$815,000 or from \$252.80 to \$346.81 per square foot

¹ Board of review second set of three comparables were renumbered as comparables #4 through #6.

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

Conclusion of Law

The appellant contends in part that 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 record contains six comparable sales for the Board's consideration. The Board gives less weight to board of review comparable #1 as its sale occurred in 2014 which is dated and less likely to reflect the subject's market value as of the January 1, 2017 assessment date. The Board also gives less weight to board of review comparables #2 and #3 due to their considerably smaller dwelling sizes when compared to the subject.

The Board finds the best evidence of market value in the record are the three comparable sales submitted by the appellant. These comparables have varying degrees of similarity when compared to the subject. They sold in July 2015 and June 2017 for prices ranging from \$485,179 to \$668,000 or from \$158.77 to \$191.24 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$800,560 or \$206.28 per square foot of living area, including land, which is above the best comparable sales in this record both in terms of overall value and on a square foot basis. After considering adjustments to the comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is warranted based on overvaluation.

Alternatively, the taxpayer contends assessment inequity as a basis of the appeal concerning the improvement assessment. 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). After an analysis of the assessment data, the Board finds after having adjusted the subject's improvement assessment based on its market value, no further reduction based on assessment inequity is warranted on this record.

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:

May 18, 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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