



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

APPELLANT: Paul Russell  
DOCKET NO.: 17-42562.001-R-1  
PARCEL NO.: 17-33-122-084-0000

The parties of record before the Property Tax Appeal Board are Paul Russell, 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:** \$11,067  
**IMPR.:** \$26,433  
**TOTAL:** \$37,500

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 multi-family, dwelling of masonry exterior construction with 1,510 square feet of living area. The dwelling is approximately 127 years old. Features include a full unfinished basement and central air conditioning. The property has a 3,162 square foot site and is located in Chicago, South 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 contends both overvaluation and lack of assessment uniformity as the bases of the appeal.

In support of the overvaluation 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 2,637 to 3,125 square feet of land area and were improved with similar class 2-11 dwellings of frame or masonry exterior construction. The comparables range in size from 1,176 to 1,680 square feet of living area and range in age from 123 to 132 years old. Each comparables has a full unfinished basement and a two-car garage. The comparables sold from July 2016 to July 2017 for prices ranging from \$239,998 to \$359,000 or from \$172.18 to \$213.69 per square foot of living area, including land.

In support of the inequity argument, the appellant submitted information on seven comparables located within the same neighborhood code as the subject and within .27 of a mile from the subject. The comparables consist of class 2-11 two-story, two-unit multi-family, dwellings of frame or masonry exterior construction. The dwellings range in age from 124 to 132 years old. The dwellings range in size from 1,400 to 1,656 square feet of living area. Each comparable has a full unfinished basement and five of the comparables each have a two-car garage. The comparables have improvement assessments ranging from \$14,052 to \$17,777 or from \$9.68 to \$12.22 per square foot of living area.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$27,494 which would reflect a total market value of \$274,940 or \$182.08 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 requested reduced improvement assessment of \$16,427 would reflect an assessment of \$10.88 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 \$38,735. The subject's assessment reflects a market value of \$387,350 or \$256.52 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 property has an improvement assessment of \$27,668 or \$18.32 per square foot of living area.

In response to the appeal, the board of review submitted three grid analyses with both sales and equity data along with a brief and printouts from the assessor's database concerning the subject. As to the comparable properties and the three grid analyses, for ease of reference after the first grid the subsequent grids have been consecutively renumbered to reflect comparables #5 through #11; comparable #10 has been eliminated from consideration as it is a duplicate of comparable #1. Board of review comparable #1 is the same property as both appellant's comparable sale #1 and appellant's equity comparable #6 and board of review comparables #3 and #9 are the same properties as appellant's equity comparables #5 and #1, respectively.

Each of the ten comparables presented by the board of review are located within the same neighborhood code as the subject and either within the "same block" or the subarea of the subject. The comparables have lots ranging in size from 2,637 to 3,162 square feet of land area and were improved either with class 2-03 or class 2-11 one-story or two-story dwellings of frame, masonry or frame and masonry exterior construction. The comparables range in size from 1,120 to 1,680 square feet of living area and range in age from 19 to 137 years old. Nine of the comparables have full basements, five of which have formal recreation rooms, and comparable #4 has a crawl-space foundation. Comparables #6 and #8 have central air conditioning and

comparables #1 through #8 each have a two-car garage. Comparables #1, #3, #8, #9 and #11 sold from April 2014 to November 2017 for prices ranging from \$250,000 to \$340,000 or from \$172.18 to \$298.25 per square foot of living area, including land. The ten comparables have improvement assessments ranging from \$14,052 to \$20,690 or from \$9.97 to \$18.15 per square foot of living area.

In the brief and supporting documentation, the board of review reported in response to the appellant's market value argument that the subject property was purchased in December 2018 for \$375,000. As the subject's current assessment reflects an estimated market value of "387,350 – right around the purchase price," the board of review further wrote that the subject's 2017 "assessed value is much lower [*sic*] than the most recent arms-length purchase of the subject, it is only equitable that the current value remain the same."

Based on this evidence, the board of review requested confirmation of the subject's assessment on both market value and equity grounds.

### **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 parties submitted a total of nine comparable sales along with limited data concerning the subject's 2018 purchase price of \$375,000 to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable sale #3 and board of review comparable #8 due to substantial differences in dwelling size when compared to the subject. The Board has also given reduced weight to board of review comparable #3 which sold in 2014, a date more remote in time to the valuation date at issue of January 1, 2017 and not as recent as other comparable sales in the record.

The Board finds the best evidence of market value to be the appellant's comparable sales #1, #2 and #4 along with board of review comparable sales #1, #9 and #10 which have varying degrees of similarity to the subject, including one common property, and the subject's 2018 purchase price. These five most similar comparables sold from July 2016 to September 2017 for prices ranging from \$250,000 to \$359,000 or from \$175.60 to \$213.69 per square foot of living area, including land. The subject's assessment reflects a market value of \$387,350 or \$256.52 per square foot of living area, including land, which is above the range of the best comparable sales in this record in terms of both overall value and on a per-square-foot basis. The subject's estimated market value is also above its recent reported purchase price from December 2018 of \$375,000. Based on this evidence and after considering the subject's recent sale price along with adjustments to the best comparable sales for differences when compared to the subject, the Board finds a reduction in the subject's assessment is justified.

Additionally, the taxpayer contends assessment inequity as another 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). 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:

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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Paul Russell, by attorney:  
George N. Reveliotis  
Reveliotis Law, P.C.  
1030 Higgins Road  
Suite 101  
Park Ridge, IL 60068

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602