



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

APPELLANT: James Brown
DOCKET NO.: 17-42564.001-R-1
PARCEL NO.: 17-29-307-044-0000

The parties of record before the Property Tax Appeal Board are James Brown, 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: \$ 9,375
IMPR.: \$31,021
TOTAL: \$40,396

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 2,106 square feet of living area. The dwelling is approximately 1 year old. Features of the home include a concrete slab foundation, central air conditioning and a 2.5-car garage. The property has a 3,750 square foot site and is located in Chicago, South Chicago Township, Cook County. The subject is classified as a class 2-78 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 information on four comparable sales that are located within the same neighborhood code as the subject. The comparables have lots ranging in size from 1,639 to 2,976 square feet of land area and are improved with similar class 2-78 dwellings of masonry exterior construction. The comparables range in size from 2,165 to 2,483 square feet of living

area and range in age from 1 to 16 years old. Two comparables have full basements, one of which has a formal recreation room, and two comparables have concrete slab foundations. Each dwelling has central air conditioning and a two-car garage. Two comparables each have one fireplace. The comparables sold from January 2015 to April 2016 for prices ranging from \$387,500 to \$458,500 or from \$175.44 to \$184.66 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$37,682. The requested assessment would reflect a total market value of \$376,820 or \$178.93 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 board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$40,396. The subject's assessment reflects a market value of \$403,960 or \$191.81 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 the board of review submitted information on four comparable sales, two of which are located within the same neighborhood code as the subject and one of which is in the subject's subarea. The comparables have lots ranging in size from 2,280 to 2,976 square feet of land area and are improved with similar class 2-78 two-story dwellings of masonry exterior construction. The comparables range in size from 2,014 to 2,400 square feet of living area and each dwelling is approximately 1 year old. Each comparable has a full or partial basement, three of which have formal recreation rooms. Each dwelling has central air conditioning and two comparables each have one fireplace. Three properties each have a two-car garage. The comparables sold from January to May 2015 for prices ranging from \$483,838 to \$1,300,000 or from \$202.08 to \$586.11 per square foot of living area, including land.

In addition, the board of review submitted documentation indicating that the subject parcel sold as a vacant lot in July 2009 for \$150,000 and furthermore, the grid analysis depicted that the subject parcel sold in June 2014 for \$130,000, a date preceding the construction of the subject dwelling.

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

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight comparable sales to support their respective positions before the Board and the board of review indicated what the recent sales of the subject's vacant

lot reflected. The Board has given reduced weight to the vacant lot sales of the subject parcel along with appellant's comparables #2 and #4 and the board of review comparables as each of the sales occurred in 2015 or an earlier date. These remote sales dates are less likely to be indicative of the subject's estimated market value as of January 1, 2017 than other more recent sales in the record.

The Board finds the best evidence of market value to be appellant's comparable sales #1 and #3 which are similar to the subject in design, exterior construction and foundation style, but are superior to the subject in dwelling size and inferior in garage size. These comparables sold in January and April 2016 for prices of \$400,000 and \$387,500 or for \$175.44 and \$178.98 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$403,960 or \$191.81 per square foot of living area, including land, which is slightly above the best comparable sales in this record but appears justified when giving due consideration to the subject's smaller dwelling size and larger garage. All other factors being equal, the economies of scale indicate that smaller structures have a higher per-square-foot cost. Based on this evidence and after considering adjustments, the Board finds a reduction in the subject's assessment is not 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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