



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

APPELLANT: Jennifer Riccardi-Virgili  
DOCKET NO.: 18-24151.001-R-1  
PARCEL NO.: 05-33-103-046-0000

The parties of record before the Property Tax Appeal Board are Jennifer Riccardi-Virgili, 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:** \$16,819  
**IMPR.:** \$95,181  
**TOTAL:** \$112,000

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 2018 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 single-family dwelling of masonry exterior construction with 3,993 square feet of living area. The dwelling is approximately 16 years old. Features of the home include a full finished basement, central air conditioning, three fireplaces, and a two-car garage. The property has a 9,894 square foot site located in Wilmette, New Trier Township, Cook County. The subject is classified as a class 2-08 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 an "As-Is" market value of \$1,100,000 as of the effective date on January 1, 2016. The appraisal report was prepared for Mrs. Jennifer Virgili by Robert S. Kang, a certified general real estate appraiser, who inspected the property on July 29, 2016 and used the sales comparison approach to provide an opinion of

the market value for the subject property with a restricted purpose of establishing an equitable ad valorem tax assessment and no other purpose. The supplemental brief submitted by the appellant's attorney stated "Mrs. Virgili – Riccardi, is the owner and taxpayer for the property located at 2223 Schiller Avneue [sic], in Wilmette, Illinois." Furthermore, page 36 of the appraisal report under the real estate tax calculation revealed that the subject property received the homeowner exemption.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$110,000 to reflect its appraised value.

The Property Tax Appeal Board (PTAB) takes notice that the subject property was the subject matter of an appeal before the Board the 2016 tax year under Docket No. 16-24026.001-R-1. In that appeal, the Property Tax Appeal Board issued a decision lowering the assessment of the subject property to \$112,000 based on an agreement between the parties.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$112,000. The subject's assessment reflects a market value of \$1,120,000 or \$280.49 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 notes on appeal also disclosed that the 2016 tax year was the first year of the general assessment period for New Trier Township.

In support of its contention of the correct assessment, the board of review submitted information on four comparables, one of which is located within the same neighborhood code as the subject property. The comparables have varying degrees of similarity to the subject property in location, age, dwelling size, and/or other features. The comparables have sites ranging from 8,850 to 12,150 square feet of land area and sold from February to October of 2017 for prices ranging from \$1,219,000 to \$1,800,000 or from \$311.92 to \$394.28 per square foot of living area, land included. 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 pursuant to Section 16-185 of the Property Tax Code a reduction in the subject's assessment is not warranted.

The Board finds the subject property is an owner-occupied residence that was the subject matter of an appeal before the Property Tax Appeal Board for the 2016 tax year under Docket Number 16-24026.001-R-1. In that appeal, the Property Tax Appeal Board issued a decision lowering the assessment of the subject property to \$112,000 based upon an agreement between the parties. The Board further finds section 16-185 of the Property Tax Code is controlling in this appeal. (35 ILCS 200/16-185).

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) provides in part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review. (35 ILCS 200/16-185)

The Board finds that if the 2016 PTAB decision was carried forward to the 2018 tax year pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/6-185) it would result in no change to the subject's assessment because the Cook County Board of Review did not modify the subject's 2018 assessment from the 2016 tax year. The record indicated that 2016 and 2018 are within the same general assessment period for New Trier Township. The appellant's evidence also indicates the property is owner occupied as the supplemental brief by the appellant's attorney indicated the appellant is the owner and taxpayer for the subject property and the appraisal report further revealed the subject property received the homeowner exemption. In addition, the record contains no evidence indicating the subject property sold in an arm's length transaction after the Board's decision or that the decision of the PTAB has been reversed or modified upon review. For these reasons, the Property Tax Appeal Board finds that the assessment of the subject property issued in the 2016 PTAB decision was carried forward to the 2018 tax year; and as a result, a further reduction in the subject's assessment 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 15, 2022



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

Jennifer Riccardi-Virgili, 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