



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

APPELLANT: Zaid Shakir
DOCKET NO.: 18-26422.001-R-1
PARCEL NO.: 18-18-207-002-0000

The parties of record before the Property Tax Appeal Board are Zaid Shakir, 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: \$7,672
IMPR.: \$27,333
TOTAL: \$35,005

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 1-story dwelling of masonry exterior construction with 1,407 square feet of living area. The dwelling is approximately 60 years old. Features of the home include a crawl space foundation, central air conditioning, a fireplace, and a two-car garage. The property has a 10,960 square foot site and is located in Western Springs, Lyons Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends both overvaluation and assessment inequity as the bases of the appeal. The land assessment was not contested.

In support of the overvaluation argument, the appellant submitted a grid analysis on four comparable sales that were located within the same neighborhood code as the subject. The

comparables had lots ranging in size from 10,010 to 14,114 square feet of land area and were improved with similar class 2-03 dwellings of frame and masonry exterior construction. The dwellings range in size from 1,442 to 1,738 square feet of living area and range in age from 52 to 56 years old. Three comparables have crawl space foundations and one comparable has a partial basement with a formal recreation room. Each comparable has central air conditioning and a two-car garage. Two comparables each have a fireplace. The comparables sold from March 2016 to April 2018 for prices ranging from \$310,000 to \$390,000 or from \$214.61 to \$227.41 per square foot of living area, including land.

In support of the inequity argument, the appellant submitted a grid analysis on seven equity comparables located within the same neighborhood code as the subject. The comparables consist of class 2-78, 1-story dwellings of masonry or frame and masonry exterior construction that range in age from 57 to 61 years old. The dwellings range in size from 1,351 to 1,686 square feet of living area. Five comparables have crawl space foundations. Two comparables have partial basements with one having a formal recreation room. Five comparables have central air conditioning. Five comparables each have one or two fireplaces and six comparables each have a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$22,578 to \$31,039 or from \$16.71 to \$18.41 per square foot of living area.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$30,820 which would reflect a total market value of \$308,200 or \$219.05 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 \$24,995 would reflect an assessment of \$17.76 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 \$35,005. The subject's assessment reflects a market value of \$350,050 or \$248.79 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 \$27,333 or \$19.43 per square foot of living area.

In response to the appeal, the board of review submitted two grid analyses totaling eight comparables. For ease of read, the second set of comparables have been renumbered as #5 through #8. The comparables sales are located within the same neighborhood code as the subject. The comparables have lots ranging in size from 9,350 to 14,025 square feet of land area and are improved with class 2-03, 1.5-story or 1-story dwellings of frame or masonry exterior construction. The comparables range in size from 1,232 to 1,555 square feet of living area and are 53 to 75 years old. Two comparables have either a partial or a full basement with one having a formal recreation room. Six comparables have crawl space foundations. Seven comparables have central air conditioning. Seven comparables each have a fireplace and each comparable has one-car or a two-car garage. Five comparables sold from March 2015 to August 2017 for prices ranging from \$320,000 to \$750,000 or from \$259.74 to \$539.57 per square foot of living area, including land. The comparables have improvement assessments ranging from \$20,668 to \$40,449 or from \$16.78 to \$29.10 per square foot of living area. 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of nine comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparables #3 and #4 along with board of review comparables #1, #2, #4 and #7 which have basements unlike the subject and/or sold in 2015 or 2016, dates more remote in time to the assessment date of January 1, 2018 than the other comparable sales in the record.

The Board finds the best evidence of market value to be the appellant's comparable sales #1 and #2 along with board of review comparable sale #3 which sold proximate in time to the valuation date at issue of January 1, 2018. These comparables are also relatively similar to the subject in location, age, dwelling size and some features. These comparables sold from July 2017 to April 2018 for prices ranging from \$310,000 to \$390,000 or from \$214.98 to \$259.74 per square foot of living area, including land. The subject's assessment reflects a market value of \$350,050 or \$248.79 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified.

Additionally, the appellant 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). 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 15 equity comparables to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparables #2, #5 and #7 along with board of review comparables #1, #2, and #3 which have basement foundations and/or lack central air conditioning when compared to the subject.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are similar to the subject in location, age, dwelling size and features. These comparables have improvement assessments that range from \$24,039 to \$33,534 or from \$17.65 to \$27.00 per

square foot of living area. The subject's improvement assessment of \$27,333 or \$19.43 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments to the comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed.

In conclusion, having examined the entire record, the Board finds that no change in the subject's assessment is warranted based either upon grounds of overvaluation or assessment inequity.

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: June 21, 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

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