



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

APPELLANT: Simeon Nockov  
DOCKET NO.: 18-32741.001-R-1  
PARCEL NO.: 13-08-329-001-0000

The parties of record before the Property Tax Appeal Board are Simeon Nockov, the appellant; 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:** \$6,828  
**IMPR.:** \$15,172  
**TOTAL:** \$22,000

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 Cape-Cod style dwelling of frame and masonry construction with 1,209 square feet of living area. The dwelling is 72 years old. Features of the home include a full basement, central air conditioning and a two-car garage.<sup>1</sup> The property has a 5,463 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

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<sup>1</sup> The parties differ as to the subject's exterior construction, whether the subject's basement is finished or whether the subject has central air conditioning. The Board finds the appellant's submission reveals that the subject has a frame and masonry exterior and central air conditioning. However, the Board could not ascertain whether the subject's basement has finished area or not, as the board of review reported the subject's basement as unfinished and the appellant failed to disclose whether the basement has any finished area.

The appellant contends overvaluation based on both a recent sale of the subject property and an analysis of similar comparable properties that have recently sold. In support of the recent sale argument the appellant submitted evidence disclosing the subject property was purchased on May 12, 2015 for a price of \$180,000. The appellant's evidence of the sale disclosed that \$10,000 was spent on the subject prior to being occupied on June 1, 2015.

The appellant's submission included several pages from an appraisal for the subject property that estimated the subject had a market value of \$195,000 as of April 21, 2015.

In further support of the overvaluation argument, the appellant submitted information on three comparable sales that were located within .4 of a mile from the subject property. The comparables included a one-story dwelling and two, Cape-Cod style dwellings that ranged in size from 1,100 to 1,289 square feet of living area. The homes ranged in age from 62 to 77 years old and had other features with varying degrees of similarity to the subject. The comparables had sale dates occurring in August 2017 or June 2018 and each sold for \$200,000 or from \$155.16 to \$181.82 per square foot of living area, including land.

Based on this evidence the appellant requested that the subject's assessment be reduced to \$18,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$27,381. The subject's assessment reflects a market value of \$273,810 or \$226.48 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 that were located in the same neighborhood code as the subject property. The comparables were two-story dwellings that ranged in size from 1,200 to 1,408 square feet of living area. The homes ranged in age from 68 to 93 years old and had other features with varying degrees of similarity to the subject. The comparables had sale dates occurring from September to November 2016 and sold for prices ranging from \$330,000 to \$400,000 or from \$248.58 to \$290.70 per square foot of living area, including land.

Based on this evidence the board of review requested the subject's assessment be confirmed.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board gave little weight to the subject's 2015 sale due to its occurrence greater than 31 months prior to the January 1, 2018 assessment date at issue. The Board finds the 2015 sale is

not recent and would not be probative of the subject's market value as of the January 1, 2018 assessment date at issue. Likewise, the Board gave little weight to the appellant's appraisal information due to its effective date occurring greater than 32 months prior to the assessment date at issue. Furthermore, the appraisal was missing the descriptive page for the subject and the comparable sales used in the appraisal.

The Board finds the best evidence of market value to be the appellant's comparable sales, even though the appellant's grid was missing information as to whether the comparables had finished basement area or not. Also missing was the neighborhood code for one comparable and whether a second comparable had central air conditioning or a fireplace. The appellant's comparables were similar to the subject in exterior construction, age, size and some features. These comparables also sold more proximate in time to the January 1, 2018 assessment date at issue, than did the subject or the board of review's comparable sales. The best comparables had sale dates of August 2017 or June 2018 and sold for \$200,000 or from \$155.16 to \$181.82 per square foot of living area, including land. The subject's assessment reflects a market value of \$273,810 or \$226.48 per square foot of living area, including land, which is not supported by the market values of the best comparables in this record. The Board gave less weight to the board of review's comparable sales due to their sale dates occurring greater than 13 months prior to the January 1, 2018 assessment date at issue. After making adjustments to the comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is 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.

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Chairman



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Member

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Member



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Member

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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: February 18, 2020



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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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