



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

APPELLANT: Edgar Mariscal  
DOCKET NO.: 18-33583.001-R-1  
PARCEL NO.: 24-04-417-046-1020

The parties of record before the Property Tax Appeal Board are Edgar Mariscal, the appellant(s), 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:** \$953  
**IMPR.:** \$13,860  
**TOTAL:** \$14,813

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 condominium unit within a 12-year-old, multi-story, masonry, 143-unit condominium building. The property is located in Oak Lawn, Worth Township, Cook County and is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of appeal. In support of this argument, the appellant included sales information on 11 units within the subject's building that sold from 2015 to 2017 for a total of \$1,795,150. The appellant deducted 10% from this value for personal property to arrive at an adjusted value of \$1,615,635. This value was divided by the percentage of ownership of the units sold of 17.581% to arrive at a value for the building of \$9,189,665.

This value was then multiplied by the percentage of ownership of the unit under appeal of 1.618% to arrive at its value of \$148,689.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's assessment of \$18,822. The subject's assessment reflects a market value for all the appealed units of \$188,220 when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted the sales of 22 units located within the subject building from 2016 to 2017 for a total value of \$1,550,541. The board of review divided this value by this unit's percentage of ownerships of units sold of 16.9360% to arrive at a value for the building of \$9,155,296. This value was then multiplied by the percentage of ownership of the unit under appeal of .095% to arrive at a value for the subject of \$8,698.

### **Conclusion of Law**

The taxpayer contends overvaluation as the basis of the appeal. 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 best evidence of market value to be the sales submitted by the board of review. These units sold for a total of \$1,550,541. The Board gives no weight to the deduction for personal property as there is no evidence to support this. Dividing the total sale price by the percentage of ownership of the units sold of 16.9360% arrives at a value for the building of \$9,155,296. The Board further finds that the board of review used an incorrect percentage of ownership for the subject while the appellant listed the correct percentage of ownership. Multiplying the value of the whole building by the subject's percentage of ownership of 1.618% reflects a value for the subject of \$148,133. The subject's current assessment reflects a market value of \$188,220 which is above the value as established by the sales. Therefore, the Board finds the appellant showed by a preponderance of the evidence that the subject property was overvalued, and a reduction 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.



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:

August 23, 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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