



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

APPELLANT: Louis Ortega  
DOCKET NO.: 18-38129.001-R-1  
PARCEL NO.: 13-23-409-044-0000

The parties of record before the Property Tax Appeal Board are Louis Ortega, 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:** \$5,040  
**IMPR.:** \$24,783  
**TOTAL:** \$29,823

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, multi-family dwelling with 1,995 square feet of living area of frame construction. It is 101 years old. The property has a 3,150 square foot site located in Jefferson Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation and assessment inequity in this appeal.

In support of the overvaluation argument, the appellant submitted evidence of four suggested comparable sales. The comparables were multi-family dwellings of frame construction or masonry construction. They range in age from 104 to 115 years and in size from 1,626 to 2,570 square feet of building area. They sold from August 2017 to August 2018 for prices ranging from

\$119.93 to \$149.81 per square foot of building area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The appellant also presented evidence on seven equity comparables in support of the assessment inequity argument. The improvements ranged in improvement assessment from \$12.22 to \$12.92 per square foot of living area.

The "Board of Review Notes on Appeal" disclosed the total assessment for the subject of \$33,684. The subject property has an improvement assessment of \$28,644 or \$14.36 per square foot of living area. The subject's assessment reflects a market value of \$336,840 or \$168.84 per square foot of living area, including land, when applying the assessment level of 10% as established by the Cook County Real Property Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables. They are improved with a two-story, multi-family dwelling of frame construction, located within a block of the subject. The improvements ranged: in size from 1,650 to 2,178 square feet of living area; in age from 101 to 116 years; and in assessment from \$14.43 to \$16.71 per square foot.

The board of review did not submit suggested comparable sales.

### **Conclusion of Law**

The taxpayer asserts assessment inequity as a 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 that the appellant has did not meet this burden of proof, and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of assessment equity to be *appellant's comparables #3 and the board of review comparables #2 and #3*. These comparables had improvement assessments that ranged from \$12.84 to \$15.22 per square foot of living area. The subject's improvement assessment of \$14.36 per square foot of living area falls within the range established by the best comparables in this record. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed, and a reduction in the subject's assessment on this basis is not justified.

The taxpayer's appeal also asserted 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 *has met* this burden of proof and a reduction in the subject's assessment *is* warranted.

The Board concludes that the best evidence of the subject's market value is the appellant's sales comparable #1, #2 and #3. These suggested comparables sold between August 2017 and August 2018, for amounts ranging from \$119.93 to \$149.81 per square foot of living area, land included. The subject property's assessment reflects a market value of \$336,840 or \$168.84 per square foot of living area, including land, which is above the range established by the best comparables in the record. Based on this evidence 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 21, 2023



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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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