



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

APPELLANT: Peter Paras
DOCKET NO.: 18-38219.001-R-1
PARCEL NO.: 13-24-306-004-0000

The parties of record before the Property Tax Appeal Board are Peter Paras, 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: \$6,930
IMPR.: \$26,180
TOTAL: \$33,110

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 2-story multi-family dwelling of masonry exterior construction with 1,874 square feet of building area. The building is approximately 111 years old. The dwelling features an unfinished full basement and a 2-car garage. The property has a 3,150 square foot site and is located in Chicago, 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 contends both overvaluation and assessment equity with respect to the subject's improvement as the bases of the appeal.

In support of the overvaluation argument, the appellant submitted information on four comparable sales with the same assessment neighborhood code as the subject property. The

appellant included equity data for these comparables which will not be considered in this appeal. The comparables have sites that range in size from 3,125 to 4,536 square feet of land area and are improved with class 2-11 multi-family dwellings of frame or masonry exterior construction that range in size from 1,746 to 3,162 square feet of building area. The comparables range in age from 102 to 120. Each comparable has a basement with three finished with either an apartment or a recreation room. Three comparables each have a 1-car to a 2.5-car garage. These comparables sold from June 2017 to August 2018 for prices ranging from \$257,500 to \$515,000 or from \$128.24 to \$170.68 per square foot of building area, land included.

As an alternate basis of the appeal, the appellant contends assessment inequity with respect to the improvement assessment. In support of this argument, the appellant submitted information on four equity comparables with the same assessment neighborhood code as the subject property. The appellant included sales data for three of these comparables which will not be considered in this appeal. The comparables are improved with 1-story or 2-story class 2-11 multi-family dwellings of frame or masonry exterior construction that range in size from 1,600 to 2,316 square feet of living area. The dwellings range in age from 96 to 125 years old. Three comparables each have a full basement with two finished with recreation rooms and one comparable has a concrete slab foundation. Three comparables each have a 1-car or a 2-car garage. The comparables have improvement assessments that range from \$19,136 to \$27,554 or from \$11.67 to \$13.04 per square foot of living area.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$28,854 reflecting a market value of \$288,540 or \$153.97 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 request would lower the subject's improvement assessment to \$21,924 or \$11.70 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 \$33,110. The subject's assessment reflects a market value of \$331,100 or \$176.68 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 subject has an improvement assessment of \$26,180 or \$13.97 per square foot of living area.

In support of its contention of the correct market value, the board of review submitted information on four comparable sales with the same neighborhood code as the subject property. The board of review provided equity data for these comparable which will not be considered in this appeal. The comparables have sites with either 3,100 or 3,150 square feet of land area and are improved with 2-story class 2-11 dwellings of frame or masonry exterior construction that range in size from 1,668 to 1,965 square feet of living area. The dwellings range in age from 105 to 112 years old. One comparable has a concrete slab foundation and three comparables each have a full basement with one finished with a recreation room. Three comparables each have a 1.5-car or a 2-car garage. The comparables sold from September 2016 to December 2018 for prices ranging from \$335,000 to \$470,000 or from \$179.34 to \$262.57 per square foot of living area, land included.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables with the same assessment neighborhood code as the subject property. The comparables are improved with 2-story class 2-11 dwellings of masonry exterior construction that range in size from 1,696 to 2,024 square feet of living area. The dwellings range in age from 93 to 110 years old. Each comparable has a full basement with one finished with a recreation room. Three comparables each have a 1.5-car or a 2-car garage. The comparables have improvement assessments that range from \$24,875 to \$39,845 or from \$14.67 to \$20.75 per square foot of living area.

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

Conclusion of Law

The appellant contends, in part, 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 eight comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2 and #4 as well as board of review comparables #1 and #4 which differ from the subject in dwelling size, lack a garage, lack a basement foundation and/or has a sale date that is less proximate to the subject's January 1, 2018 valuation date at issue, and less likely to reflect the subject's market value for the assessment date at issue.

The Board finds the best evidence of market value to be the appellant's comparable #3 and board of review comparables #2 and #3 which are more similar to the subject in age, dwelling size and other features. These comparables sold from June 2017 to October 2018 for prices ranging from \$257,500 to \$405,000 or from \$128.24 to \$219.42 per square foot of living area, land included. The subject's assessment reflects a market value of \$331,100 or \$176.68 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. Based on the record 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 based on overvaluation request is not justified.

The taxpayer also contends assessment inequity as an alternative 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 eight suggested equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables as well as board of review comparable #3 which differ from the subject in dwelling size and/or lack a garage or a basement foundation, both features of the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #1, #2, and #4 which are more similar to the subject in age, dwelling size and most features. These comparables have improvement assessments that range from \$24,875 to \$39,845 or from \$14.67 to \$20.75 per square foot of living area. The subject's improvement assessment of \$26,180 or \$13.97 per square foot of living area falls within the range established by the best comparables in the record on an overall improvement assessment basis but below on a per square foot basis. Based on this record and after considering adjustments to the best comparable for differences from the subject, 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 is not justified on this basis.

In conclusion on this record, the Property Tax Appeal Board finds that the subject's assessment as established by the board of review is correct and no reduction is 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: February 21, 2023



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

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