



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

APPELLANT: Shaker Mohammed
DOCKET NO.: 18-39236.001-R-1
PARCEL NO.: 27-36-120-016-0000

The parties of record before the Property Tax Appeal Board are Shaker Mohammed, 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: \$5,309
IMPR.: \$17,458
TOTAL: \$22,767

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 dwelling of frame and masonry construction with 1,830 square feet of living area. The dwelling is 21 years old. Features of the home include a full unfinished basement, central air conditioning and an attached 2-car garage. The property has a 5,309 square foot site and is located in Tinley Park, Orland Township, Cook County. The subject is classified as a class 2-95 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on both overvaluation and assessment inequity with respect to the subject's improvement. In support of the overvaluation argument the appellant submitted information on four comparable sales that are located within the same neighborhood code as the subject. The comparables have sites ranging in size from 3,720 to 6,389 square feet of land area that are improved with class 2-95 dwellings of frame and masonry construction. The homes

range in size from 1,611 to 2,178 square feet of living area and are 20 or 21 years old. The comparables have full unfinished basements, central air conditioning and an attached 2-car garage. The comparables sold from September 2017 to June 2018 for prices ranging from \$185,000 to \$235,000 or from \$105.60 to \$117.43 per square foot of living area, including land.

In support of the improvement assessment inequity argument, the appellant submitted a grid analysis containing seven comparable properties that are located within the same neighborhood code as the subject. The comparables are improved with class 2-95 dwellings of frame and masonry construction that contain 2,178 square feet of living area and are 20 or 21 years old. The comparables have full unfinished basements, central air conditioning and an attached 2-car garage. One comparable has a fireplace. The comparables have improvement assessments ranging from \$17,325 to \$19,392 or from \$7.95 to \$8.90 per square foot of living area.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$20,622.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$22,767. The subject's assessment reflects a market value of \$227,670 or \$124.41 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 has an improvement assessment of \$17,458 or \$9.54 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted a grid analysis containing four comparable properties that are located within the same neighborhood code as the subject. The comparables have sites with 3,720 square feet of land area that are improved with class 2-95 dwellings of frame and masonry construction. The homes contain 1,611 square feet of living area and are 21 years old. The comparables have full unfinished basements, central air conditioning and a 2-car garage. The comparables sold from July 2016 to September 2018 for prices ranging from \$205,000 to \$222,000 or from \$125.39 to \$137.80 per square foot of living area, including land.

The comparables have improvement assessments ranging from \$16,480 to \$18,981 or from \$10.23 to \$11.78 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 eight comparable sales for the Board's consideration. The Board gives less weight to the board of review's comparables #1 and #2, due to their sale date occurring greater than 12 months prior to the January 1, 2018 assessment date at issue. The Board finds the parties' remaining comparable sales have varying degrees of similarity to the subject and also sold proximate in time to the January 1, 2018 assessment date at issue. The best comparables sold from May 2017 to September 2018 for prices ranging from \$185,000 to \$235,000 or from \$105.60 to \$137.80 per square foot of living area, including land. The subject's assessment reflects a market value of \$227,670 or \$124.41 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record. After considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and a reduction in the subject's assessment is not justified based on overvaluation.

The taxpayer also contends improvement 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 based on assessment inequity.

The parties submitted 11 equity comparable properties for the Board's consideration. The Board finds each of the parties' equity comparables are similar to the subject in location, building classification, age, and most features. However, the appellant's equity comparables have larger dwellings and the board of review's comparables have smaller dwellings. Nevertheless, the parties' equity comparables have improvement assessments ranging from \$16,480 to \$19,392 or from \$7.95 to \$11.78 per square foot of living area. The subject's improvement assessment of \$17,458 or \$9.54 per square foot of living area falls within the range established by the parties' equity comparables. After considering adjustments to the equity comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is supported and a reduction in the subject's assessment is not justified based on improvement 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:

December 20, 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

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