



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

APPELLANT: One Group Mind Holdings LLC  
DOCKET NO.: 19-38584.001-C-2  
PARCEL NO.: 17-06-211-038-0000

The parties of record before the Property Tax Appeal Board are One Group Mind Holdings LLC, the appellant(s), by attorney Dimitrios Trivizas, of Dimitrios P. Trivizas, Ltd. in Skokie; 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:** \$9,045  
**IMPR.:** \$48,455  
**TOTAL:** \$57,500

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 2019 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 2,003 square foot parcel of land improved with a 109-year-old, renovated, one and part two-story, masonry, mixed-use building containing approximately 2,878 square feet of building area. The property is located in Chicago, West Township, Cook County and is classified as a class 5 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and a contention of law as the bases of the appeal. In support of the overvaluation argument, the appellant submitted an appraisal which estimated the subject's market value as of December 5, 2018 of \$575,000. The appraiser utilized the income and sales comparison approaches to value to estimate the subject's market value. The appraisal discloses a sale in March 2015 for \$350,000 and states that after the purchase the ownership

spent in excess of \$145,000 on capital improvements which enhanced the useful life of the subject.

In addition, the appellant disclosed on the petition that the subject was purchased on March 12, 2015 for \$350,000. The petition discloses that the transfer was not between related parties, the property was sold with involvement of a realtor, that the property was advertised for sale on the open market for 147 days, and the sale was not a contract for deed or due to a foreclosure. The appellant included the multiple listing data base (MLS) printout, the warranty deed, and a seller's statement to support this sale.

The appellant also contends the subject should be assessed as a class 2-12 property as it is a mixed-use commercial/residential building under that classification. The appellant asserts a 10% level of assessment should apply to the market value based on this 2-12 classification. To support this argument, the appellant submitted black and white photographs of the subject; an affidavit from the manager of appellant attesting that the first floor is commercial space with a residential apartment on the second floor; a building permit disclosing that the second floor will be residential; a letter to the city detailing the use of the property; a plat of survey; floorplans; and a zoning and permit certification. The appraisal also describes the subject as a mix-use building with commercial use on the first floor and residential use on the second floor.

The board of review did not submit its "Board of Review Notes on Appeal." The subject's total assessment based on the board of review's decision is \$57,500 which reflects a market value of \$575,000 using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10% which is the classification assigned to the subject.

In support of the current assessment, the board of review submitted four comparables. The comparables sold from May to June 2021 for prices ranging from \$73.00 to \$145.00 per square foot of building area with one property listed on a per unit sale price. The board of review did not address the appellant's classification argument.

In rebuttal, the appellant submitted a letter addressing the subject 201, 2017, and 2018 omitted property assessments which were never appealed to the Board. The appellant then asserts the board of review comparables are too far removed from the lien date and should be given no weight.

### **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 gives no weight to the sale of the subject as it occurred more than three years prior to the lien date and the appraisal discloses that there was extensive improvements made to the building after the sale.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The subject's assessment reflects a market value above the best evidence of market value in the record. The appellant's appraiser utilized the income and sales comparison approaches to value in determining the subject's market value. The Board finds this appraisal to be persuasive because the appraisal discloses that the appraiser inspected the subject, reviewed the property's history, and used similar properties in the sales comparison approach while providing adjustments that were necessary. Therefore, the Board finds the subject property had a market value of \$575,000 as of the assessment date at issue.

The appellant also disputed the level of assessment of the subject property in part based upon a contention of law. However, the Board notes that the subject is classified as a 2-12 property and assessed at 10% which is what the appellant was seeking. Since market value has been established the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10% shall apply which is what the board of review has assessed the subject at 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:

November 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

AGENCY

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APPELLANT

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