



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

APPELLANT: Andres Ramirez  
DOCKET NO.: 19-42586.001-R-1  
PARCEL NO.: 17-05-315-057-1003

The parties of record before the Property Tax Appeal Board are Andres Ramirez, 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 **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:** \$3,478  
**IMPR.:** \$59,701  
**TOTAL:** \$63,179

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 is a residential condominium unit with a 0.34% ownership interest in the common elements. It is situated in a three-unit, eight-year-old, multi-story building. The property sits on a 3,069 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject 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 the appeal. In support of this argument the appellant submitted information on three comparable sales and a condominium analysis. Each of the comparable sales are from within the building including one being the sale of the subject property. The sales comparables ranged in price from \$425,000 to \$840,000 and all sold between May 2017 and March 2019. The appellant added each of the sales (\$425,000 + \$840,000 + \$630,000) to get the total sales of \$1,895,000. The appellant then subtracted 10% of the total

sales (\$189,500) for a personal property reduction to get an adjusted value of \$1,705,500. The total percentage of ownership was 100%. The appellant then multiplied the adjusted value by the percentage of ownership of the subject property (33.34%) to get an estimated market value of \$568,614. The appellant then multiplied that by the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance to get their “desired assessed value” of \$56,861. Based on this evidence, the appellant is requesting the assessment be reduced to \$56,861.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$63,179. The subject's assessment reflects a market value of \$631,790 when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment the board of review submitted information on comparable sales utilizing a condominium analysis consisting of three sales of condominiums from the subject's condominium complex. The board of review's three comparables are the same as the appellant's three comparables. The sales comparables ranged in price from \$425,000 to \$840,000 and all sold between May 2017 and March 2019. The board of review's analysis is largely the same as the appellant's analysis except for the board of review did not subtract any amount for personal property from the total sales of \$1,895,000. Given that the total sales were 100% of the units sold, the board of review multiplied the total sales by the percentage of ownership of the subject property (33.34%) to get an estimated market value of \$631,793. The board of review then multiplied that by the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance to get their “desired assessed value” of \$63,179. Based on this evidence, the board of review is requesting the assessment be upheld.

### **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 finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

“Real property taxes . . . which are authorized by law to be assessed against and levied upon real property shall be assessed against and levied upon each unit and the owner's corresponding percentage of ownership in the common elements as a tract, and not upon the property as a whole.” 765 ILCS 605/10(a).

The only difference between the appellant's condominium analysis and the board of review's condominium analysis is the appellant's request to include a 10% reduction of total sales price for personal property. The board gives little weight to the appellant's request for a reduction of the sales price of 10% based on personal property. The appellant did not provide sufficient evidence detailing the personal property purported to be part the sales or supply any authority that this reduction must be given.

As such, the Board finds the best evidence of market value to be the board of review's condominium analysis. The board of review's condominium analysis reflects comparables sales that were within the same building complex as the subject property. The subject's assessment reflects a market value of \$631,790, which is equal to the market value established by the best evidence in this record, that being the board of review's condominium analysis. Based on this evidence the Board finds a reduction in the subject's assessment is not 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:

May 21, 2024



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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