



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

APPELLANT: Mark & Anne Burnell
DOCKET NO.: 19-44435.001-R-1
PARCEL NO.: 17-06-121-059-0000

The parties of record before the Property Tax Appeal Board are Mark & Anne Burnell, 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: \$5,341
IMPR.: \$54,659
TOTAL: \$60,000

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 23-year-old, two-story, single-family townhome of masonry construction with 1,328 square feet of living area. The property has a 1,174 square foot site and is located in Chicago, West Chicago Township, Cook County. Features of the building include two full bathrooms and a two-car garage. There is conflicting evidence as to the foundation of the subject property. The subject is classified as a class 2-95 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 four comparable sales. The appellant did not report the exact proximity of the suggested comparables to the subject but disclosed that each of them had the same neighborhood code as the subject. The comparable properties sold between July 2017 and August 2018. The comparable properties ranged: in price between \$675,000 to \$758,000; in

living area square footage between 1,581 to 2,027; and in sale price per square foot between \$373.95 to \$455.41, including land.

The appellant also contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables with varying degrees of similarities to the subject. The comparable properties were located within .02 miles of the subject property. The comparables had improvement assessments ranging from \$41.47 to \$45.20 per square foot of living area.

Based on this evidence under both of these theories, the appellant requested a reduction in the subject's assessment to \$53,015.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$75,094. The subject's assessment reflects a market value of \$750,940 or \$565.47 in market value per square foot of living area, including land, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The subject property has an improvement assessment of \$69,753 or \$52.52 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on three comparable properties, each of which had sales and equity information. The board of review did not report the exact proximity of the suggested comparables to the subject and disclosed that each of them had a different neighborhood code than the subject. The comparable properties sold between June 2017 and September 2018. The comparable properties ranged: in price between \$890,000 to \$925,000 and in sale price per square foot between \$668.17 to \$694.44, including land. Each of the three comparable properties had a living area square footage of 1,332. The comparables had improvement assessments that ranged from \$56.14 to \$59.21 per square foot of living area. Based on this evidence, the board of review requested that the assessment be confirmed.

Conclusions of Law

As a preliminary matter, the board of review lists the subject property as having a finished partial basement. The appellant's equity grid and supplemental Cook County Assessor print out lists the subject property as having a finished partial basement. However, the appellant's sales grid lists the subject property as having a crawl space and a formal recreation room. The Board finds that the best evidence as to the subject's foundation is that of the board of review, the appellant's equity grid, and the Cook County Assessor printout and the Board finds that the subject property has a finished partial basement.

The taxpayer asserts 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 taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 met this burden of proof and a reduction in the subject's assessment on this basis 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. Like the subject property, these comparables are class 2-95, single-family dwellings with similar living areas, similar exterior construction, similar number of bathrooms, a finished partial basement, garage space, and are located within the same neighborhood code.

These comparables sold between July 2017 and September 2018, for amounts ranging from \$342.29 to \$455.41 per square foot of living area, land included in the sale price. The subject property's assessment reflects a market value of \$750,940, land included, or \$565.47 per square foot of living area, which is above the range established by the best comparables in the record. Accordingly, the Board determines that the appellant has established by a preponderance of the evidence that the subject property was overvalued. Based on the evidence, the Board therefore finds that a reduction in the subject's assessment on this basis is justified. Since market value has been determined, the Board finds that the subject is now fairly and equitably assessed. See Central Nursing Realty, LLC v. Illinois Property Tax Appeal Board, 2020 IL App (1st) 180994, ¶¶ 34-36.

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

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: _____

July 16, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Mark & Anne Burnell, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602