



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

APPELLANT: Edward Gal
DOCKET NO.: 20-24600.001-R-1
PARCEL NO.: 23-02-207-025-1007

The parties of record before the Property Tax Appeal Board are Edward Gal, 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 **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: \$2,133
IMPR.: \$4,344
TOTAL: \$6,477

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 2020 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 residential condominium unit with an 8.31% ownership interest in the common elements of the condominium. The dwelling is located within a 14-unit masonry constructed condominium that is approximately 40 years old. The property has a 17,704 square foot site and is located in Hickory Hills, Palos 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 eight comparable sales located within the same condominium as the subject. The comparables are improved with residential condominium units with 5.28% to 8.79% ownership interests and sold on October 26, 2020 for prices ranging from \$22,968 to \$38,237. The appellant submitted a listing sheet indicating the eight units were listed for 35 days

for a price of \$499,900 and sold for \$475,000 on October 26, 2020. The appellant also submitted listing sheets for sales of comparables #4, #5, and #6 plus one additional comparable that sold from March 2014 to June 2016 for prices ranging from \$50,000 to \$60,000.

The appellant submitted a brief contending that the only recent sales in the subject's condominium were the sales presented by the appellant which was a cumulative sale of eight units. The appellant asserted these properties were listed for \$499,900, reduced to \$475,000, and sold for \$435,000. The appellant submitted an analysis of the total sale price for these units of \$435,000 and their aggregate ownership interests of 55.81%, concluding a total value for the condominium of \$779,430 and a value of \$64,770 for the subject based on its 8.31% ownership interest.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$6,477.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$12,032.¹ The subject's assessment reflects a market value of \$120,320, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted a condominium analysis based on a sale of the subject in January 2017 for a price of \$60,500. Based on this sale, the board of review calculated a value for the condominium of \$728,038 and a value for the subject of \$60,499. The board of review indicated a revised assessment for the subject on its "Notes on Appeal" of \$6,049.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the condominium analysis presented by the board of review, which concludes a value of \$60,499 for the subject. The subject's assessment reflects a market value of \$120,320 which is above the value established by the board of review's analysis. The Board gave less weight to the appellant's comparables sales as these properties sold in a bulk purchase, which may not be indicative of the fair market value of each of the units if purchased individually, and the appellant's analysis relied on a different sale price than is reflected in the listing sheet presented by the appellant. The Board also gave less weight to the 2014, 2015, and 2016 sales presented by the appellant as these sales occurred more remote

¹ The Board notes the board of review reported an original assessment of \$12,032 and a revised assessment of \$6,049, but the appellant presented a copy of the board of review's final decision which indicates a final assessment of \$12,032.

in time to the assessment date and are less likely be indicative of market value as of the assessment date.

Based on this evidence, the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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

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

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