



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

APPELLANT: Zuhair Barkat
DOCKET NO.: 20-29660.001-R-1
PARCEL NO.: 24-26-102-078-1004

The parties of record before the Property Tax Appeal Board are Zuhair Barkat, 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: \$1,115
IMPR.: \$3,552
TOTAL: \$4,667

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 located in a building of masonry exterior construction that is approximately 47 years old and contains 12 residential condominium units. The subject property has an 8.33% of ownership interest in the condominium. The condominium complex has a 16,740 square foot site located in Alsip, Worth Township, Cook County. The subject is classified as a class 2-99 residential condominium 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 a grid analysis of the subject and four comparable sales with the same neighborhood code as the subject property. The appellant also provided Multiple Listing Service sheets associated with three of the four comparable sales. The four comparable properties are reported to each have an 8.33% ownership interest in the common elements of the condominium

property. The comparables sold from December 2015 to March 2019 for prices ranging from \$28,000 to \$52,000. The appellant's sales analysis calculated the total consideration of the four comparable sales to be \$166,900. The appellant applied a personal property adjustment of \$4,200 which was deducted from the total consideration of the sales to arrive at a total adjusted consideration of \$162,700. The total adjusted consideration of \$162,700 was divided by the total percentage interest of ownership of the units of 33.32% to arrive at an indicated full value for the condominium property of \$488,295. Applying the subject's percentage of ownership in the condominium property to the estimated value of the property results in a market value estimate of \$40,675 which equates to an assessment of \$4,068, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$4,667. The subject's assessment reflects a market value of \$46,670 when using the Cook County Real Property Assessment Classification Ordinance level of assessments for class 2-99 property of 10%.

The board of review submitted a copy of a Condominium Analysis Results for 2020 for the subject's condominium building disclosing the subject unit has an 8.333% ownership interest in the complex. In support of its contention of the correct assessment the board of review submitted information on one comparable sale of a condominium unit that was also included in the appellant's analysis. This sale had an ownership interest of 8.334%. This comparable sold in March 2019 for a price of \$52,000. The board of review then divided the total consideration by the percentage of ownership interest in this unit resulting in a full market value for the building of \$623,950. Multiplying the full market value of the building by the subject's percentage of ownership interest of 8.333% results in an estimated value for the subject unit of \$51,993 and a total assessment of \$5,199 when applying the level of assessment for class 2-99 property of 10%, which is above the subject's total assessment.

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.

The appellant provided a sales analysis of four comparable sales while the board of review provided a sales analysis of one comparable sale that was also used in the appellant's analysis.

The Board gives less weight to the estimated market value as indicated in the appellant's sales analysis as three of the four sales occurred in 2015 or 2017 which are approximately two to four years prior to the January 1, 2020 assessment date and are less likely to reflect the subject's market value as of assessment date at issue. Furthermore, the appellant applied a 2% personal property adjustment factor which was deducted from the total consideration of the sales prices in the analysis but failed to provide any evidence to support the adjustment.

The Board finds the best evidence of market value in the record to be the condominium analysis presented by the board of using one recent sale, that occurred in March 2019 for a price of \$52,000. Using this sale and the residential unit's corresponding percentage of ownership interest in the condominium, the board of review arrived at a total value for the subject's condominium complex of \$623,950. Multiplying the full market value of the complex by the subject's percentage of ownership interest of 8.334% results in an estimated value for the subject property of \$51,993, which is above the market value reflected by the subject's assessment of \$46,670.

Based on this record the Board finds the subject's total assessment is reflective of market value as of January 1, 2020, and 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: _____

August 20, 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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