



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

APPELLANT: Rima Muthana  
DOCKET NO.: 20-30193.001-R-1 through 20-30193.002-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Rima Muthana, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-30193.001-R-1	24-17-107-056-1006	969	4,458	\$5,427
20-30193.002-R-1	24-17-107-056-1024	1,187	5,461	\$6,648

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 assessments 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 two individual residential condominium units located within a 24-unit condominium building that is approximately 10 years old. The two units have a combined 8.01% ownership interest in the condominium.<sup>1</sup> The building has a 31,682 square foot site and is located in Chicago Ridge, Worth Township, Cook County. The subject units are each classified as class 2-99 properties 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, where comparable #4 is one of the two subject parcels on appeal. The comparables are each located in the same condominium

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<sup>1</sup> As reported by the board of review and not challenged by the appellant unit -1006 has a 3.6% ownership interest in the building and unit -1024 has a 4.410% ownership interest in the building.

building as the subject parcels. Each comparable is a class 2-99 condominium unit that is 10 years old. The comparable units sold from February 2016 to March 2018 for prices ranging from \$42,000 to \$74,000.

In a brief prepared by counsel, the appellant reported the ownership percentage attributable to each comparable sale reflects a combined ownership percentage of 15.22%. The appellant reported the four sales reflect a combined price of \$214,500 and next the appellant deducted 5% for personal property or \$4,600 resulting in an adjusted total value of \$209,900. When applying the combined ownership percentage of 15.22%, the appellant found the total fair market value of the building based on these sales to be \$1,376,106. Next the appellant applied the combined ownership percentage of the two units on appeal of 8.01% to the total building value to arrive at a market value for the subject units of \$110,466, or at the 10% level of assessment of \$11,047. Based on the foregoing evidence and applying the respective ownership percentages to each unit, the appellant requested reductions in the assessments of the two residential condominium units on appeal to \$4,965 and \$6,082, respectively.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the combined assessment for the units under appeal of \$12,075. The subject units' combined assessment reflects a combined market value of \$120,750, when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 of 10%.

In support of its contention of the correct assessment, the board of review submitted a document entitled Condominium Analysis Results for 2020 in which it used five sales, including the appellant's sales #1, #2 and #3, along with two additional sales. The sales occurred from February 2017 to June 2019 for prices ranging from \$42,000 to \$74,000. The board of review reported the five units sold for a combined sales price of \$308,135 with a combined 20.44% ownership interest in the condominium. Dividing the total consideration by the percentage of ownership in the condominium resulted in a full value for the condominium building of \$1,507,509. Multiplying the full value of the condominium building by the percentage of ownership in the two condominium units under appeal totaling 8.01% results in a market value of \$120,752. Applying the 10% Ordinance level of assessment for class 2-99 property results in a total combined assessment for the units under appeal of \$12,075.

Based on the foregoing evidence and analysis, the board of review requested confirmation of the subject units' assessments.

### **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 record evidence establishes that no reductions in the subject's assessments are warranted.

The appellant provided a grid analysis of four comparable sales of residential condominium units, located within the subject's condominium building, one of which is one of the parcels on

appeal with a sale date in February 2016, four years prior to the lien date at issue. The board of review provided a sales analysis of five sales, three of which were presented by the appellant along with two sales more proximate in time to the lien date of January 1, 2020, which are also in the subject's condominium building to support its position before the Property Tax Appeal Board.

The Board has given little weight to the appellant's sale #4, the sale of one of the two parcels on appeal, as the sale occurred least proximate to the lien date. The Board has also given little consideration to the appellant's analysis of valuation contained in the brief which made an unexplained and unsupported 5% deduction for personal property in computing the value of the units that sold.

The Board finds the best evidence of market value on this record to be the five sales located in the subject's condominium building provided by the board of review. The sales occurred from February 2017 to June 2019 for prices ranging from \$42,000 to \$74,000. The units sold for a combined sales price of \$308,135 with a combined 20.44% ownership interest in the building. The Property Tax Appeal Board also calculated the sales prices of the condominium units that sold and utilized the percentage interest of ownership in the units that sold indicating a full value for the condominium property of \$1,507,509. Next, applying the combined ownership interest of the two units on appeal of 8.01%, the Board finds the correct combined assessment of the two parcels on appeal is \$12,075, which is identical to the current combined assessment of the two units on appeal in this matter.

Based on this evidence, the Board finds reductions in the subject residential units' assessments are not 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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