



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

APPELLANT: Edward Gal  
DOCKET NO.: 20-30194.001-R-1 through 20-30194.002-R-1  
PARCEL NO.: See Below

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 **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
20-30194.001-R-1	24-15-325-062-1006	1,028	6,072	\$7,100
20-30194.002-R-1	24-15-325-062-1008	1,028	6,072	\$7,100

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 twelve-unit condominium building that is approximately 45 years old. The two units have a combined 16.666% ownership interest in the condominium.<sup>1</sup> The condominium property has a 14,964 square foot site and is located in Oak Lawn, 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. The comparables are each located in the same condominium building as the subject parcels. Each comparable is a class 2-99

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<sup>1</sup> As reported by the board of review and not challenged by the appellant each unit reportedly has an 8.3330% ownership interest in the condominium.

condominium unit that is 45 years old. The comparable units sold from February 2015 to March 2020 for prices ranging from \$53,000 to \$79,900.

In a brief prepared by counsel, the appellant reported the ownership percentage attributable to each comparable sale reflects a combined ownership percentage of 33.417%. The appellant reported the four sales reflect a combined price of \$271,800 and next the appellant deducted 5% for personal property or \$7,990 resulting in an adjusted total value of \$263,810. When applying the combined ownership percentage of 33.417%, the appellant found the total fair market value of the condominium property based on these sales to be \$789,448. Next the appellant applied the combined ownership percentage of the two units on appeal using 16.708% to the total condominium property value to arrive at a market value for the subject units of \$131,901, or at the 10% level of assessment of \$13,190. 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 \$6,595 each.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the combined assessment for the units under appeal of \$14,200. The subject units' combined assessment reflects a combined market value of \$142,000, 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 one sale, appellant's sale #2, to establish the value of the condominium property. The sale occurred in June 2017 for \$79,900. The board of review reported the unit that sold has an 8.3330% ownership interest in the condominium. Dividing the sale price by the percentage of ownership in the condominium resulted in a full value for the condominium building of \$958,838. Multiplying the full value of the condominium building by the percentage of ownership in the two condominium units under appeal totaling 16.6660% would result in a market value of \$159,800, although the board of review analysis skipped this step and applied the 10% level of assessment to the entire condominium property value to arrive at a correct assessment of \$95,884. Applying the correct mathematical formula would result in an assessment for the two parcels on appeal of \$15,980,

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, where comparable #4 sold in February 2015, nearly five years prior to the lien date at issue. The board of review provided a sales

analysis of one sale, appellant's comparable #2, to support its position before the Property Tax Appeal Board.

The Board has given little weight to the appellant's sale #4, 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 common sale presented by the parties along with appellant's comparables #1 and #2. The sales occurred from May 2017 to March 2020 for prices of either \$59,000 or \$79,900. The units sold for a combined sales price of \$218,800 with a combined 25.00% 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 \$875,200. Next, applying the combined ownership interest of the two units on appeal of 16.6660%, results in a value for the two units of \$145,861. Then, applying the level of assessment of 10%, the Board finds the correct combined assessment of the two parcels on appeal is \$14,586, which is above the current combined assessment of the two units on appeal in this matter of \$14,200.

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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