



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

APPELLANT: Edward Gal
DOCKET NO.: 20-30195.001-R-1
PARCEL NO.: 24-15-325-068-1006

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: \$1,105
IMPR.: \$7,580
TOTAL: \$8,685

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 single residential condominium unit located within a twelve-unit condominium building that is approximately 45 years old. The unit has an 8.3330% ownership interest in the condominium. The condominium property has a 16,077 square foot site and is located in Oak Lawn, Worth Township, Cook County. The subject unit 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 four comparable sales. The comparables are each located in similar condominium buildings as the subject property. Each comparable is a class 2-99 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 incorrectly reported the four sales reflect a combined price of \$81,000¹ and next the appellant deducted 5% for personal property or \$4,050 resulting in an adjusted total value of \$76,950. Next the appellant applied the subject's ownership percentage of 8.3330% to the total condominium property value to arrive at a market value for the condominium property of \$923,437, or at the 10% level of assessment of \$76,950 [*sic*].² Based on the foregoing evidence and applying the 10% level of assessment, the appellant requested a reduction in the assessment of the unit on appeal to \$7,695 [*sic*].

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$9,148. The subject's assessment reflects a market value of \$91,480, including land, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

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 two sales to establish the value of the condominium property. The sales occurred in July and November 2020 for \$81,000 and \$92,700, respectively. The board of review reported the units that sold have a 16.6660% ownership interest in the condominium. Dividing the total sale prices by the percentage of ownership in the condominium resulted in a full value for the condominium building of \$1,042,241. Multiplying the full value of the condominium building by the percentage of ownership in the unit under appeal of 8.3330% results in a market value of \$86,849. Applying the 10% level of assessment to the subject's market value results in an assessment of \$8,685, which is below the current assessment. In addition, the board of review reported that the subject unit sold in January 2021 for \$110,000 such that its 2020 assessment is "fair."

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 supports that a reduction in the subject's assessment is warranted.

The appellant provided four sales of condominium units located in relatively close proximity to the subject, but which are not within the subject's condominium property. Moreover, appellant's comparable #4 sold in 2015, a date more remote in time to the lien date at issue than other sales in the record. The board of review provided two comparable sales of units within the subject's condominium property in support of the subject's assessment. The Board has given reduced weight to the appellant's evidence due to differences in location and the dated nature of

¹ Mathematically, the four sales total \$271,800 and 5% for personal property would be \$13,590, resulting an combined adjusted sales price of \$258,210.

² Mathematically, the correct 10% figure to the entire association value would be \$92,344 and applying 10% a second time would reflect an assessment of the unit on appeal of \$9,234.

comparable #4. The Board has also given little consideration to the appellant's 5% deduction for personal property which lacked support in the record.

The Board finds the best evidence of market value to be the board of review comparable sales. The sales occurred in July and November 2020 for \$81,000 and \$92,700, respectively. The units sold for a combined sales price of \$173,700 with a combined 16.6660% ownership interest in the condominium. This calculation resulted in a full value for the condominium property of \$1,042,241. Next, applying the ownership interest of the unit on appeal of 8.3330%, results in a value for the subject of \$86,849. Then, applying the level of assessment of 10%, the Board finds the correct combined assessment of the parcel on appeal is \$8,685, which is below the current assessment of the unit on appeal in this matter of \$9,148.

Based on this evidence the Board finds a reduction in the subject's assessment is 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

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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