



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

APPELLANT: Mark Feyman
DOCKET NO.: 20-43741.001-R-1
PARCEL NO.: 29-18-218-048-0000

The parties of record before the Property Tax Appeal Board are Mark Feyman, 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: \$1,585
IMPR.: \$10,287
TOTAL: \$11,872

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 two-story multi-family building of masonry exterior construction with 4,023 square feet of building area. The building is approximately 60 years old. Features of the building include a concrete slab foundation and six full bathrooms. The property has an approximately 5,766 square foot site and is located in Harvey, Thornton Township, Cook County. The subject is classified as a class 2-11 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 that are located in Harvey and have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 2,970 to 8,697 square feet of land area. The comparables are class 2-11 properties that are improved with multi-family buildings of frame or masonry exterior construction ranging in

size from 2,059 to 5,624 square feet of building area. The dwellings are 59 to 117 years old. The comparables each have a basement, one of which is finished as an apartment. One comparable has six full bathrooms and three comparables each have two full bathrooms. Two comparables each have a one-car or a two-car garage. The properties sold from May 2018 to August 2020 for prices ranging from \$17,500 to \$57,000 or from \$3.11 to \$26.24 per square foot of building area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$6,212, reflecting a market value of \$62,120 or \$15.44 per square foot of building area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$11,872. The subject's assessment reflects a market value of \$118,720 or \$29.51 per square foot of building area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on three comparable properties that are located in Blue Island, Harvey or Dolton, one of which has the same assessment neighborhood code as the subject. The comparables have sites that range in size from 4,818 to 15,745 square feet of land area. The comparables are class 2-11 properties that are improved with two-story multi-family buildings of frame or masonry exterior construction ranging in size from 3,794 to 4,963 square feet of building area. The buildings are 13 to 54 years old. Two comparables each have a full basement that is finished with an apartment and one comparable has a concrete slab foundation. One comparable has three full bathrooms and three half bathrooms, one comparable has five full bathrooms and one comparable has six full bathrooms. The properties sold from June 2018 to November 2020 for prices ranging from \$146,500 to \$230,000 or from \$33.79 to \$52.71 per square foot of building area, land included. Based on this evidence, the board of review requested confirmation of the subject's 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 record contains seven comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables are due to their substantially larger or smaller building sizes when compared to the subject. The Board has also given less weight to board of review comparables #1 and #3 which have different assessment neighborhood codes and are located in different cities than the subject.

The Board finds on this limited record that the best evidence of market value is board of review comparable sale #2. The Board finds this comparable to be similar to the subject in location and

most similar to the subject in building size, design and number of bathrooms. However, the Board finds the building is superior to the subject in that it is newer in age and has a basement that is finished as an apartment, suggesting downward adjustments would be required to make the comparable more equivalent to the subject. Nevertheless, this comparable sold in June of 2018 for a price of \$146,500 or \$33.79 per square foot of building area, including land. The subject's assessment reflects a market value of \$118,720 or \$29.51 per square foot of building area, including land, which is less than the most similar comparable sale in the record and appears to be logical given its older age and lack of a basement apartment. Based on this record and after considering adjustments to the best comparable for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not warranted based on overvaluation.

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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