



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

APPELLANT: Mark Feyman
DOCKET NO.: 20-43744.001-R-1 through 20-43744.002-R-1
PARCEL NO.: See Below

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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-43744.001-R-1	29-07-316-016-0000	852	6,354	\$7,206
20-43744.002-R-1	29-07-316-017-0000	852	7,445	\$8,297

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 two parcels improved with a multi-family building of masonry exterior construction with 3,996 square feet of building area.¹ The building is approximately 60 years old. Features of the building include a basement finished with a formal recreation room and six full bathrooms. The property has an approximately 6,200 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 and property classification code as the subject. The

¹ The Board finds the best description of the subject was provided by the appellant, as the board of review evidence only contained information on one parcel under appeal.

comparables have sites that range in size from 4,687 to 7,561 square feet of land area. The comparables are improved with multi-family buildings of frame or masonry exterior construction ranging in size from 2,112 to 4,336 square feet of building area. The buildings are 13 to 117 years old. The comparables each have a basement, two of which are finished with apartments. Each comparable has two or three full bathrooms, one comparable has two fireplaces and two comparables each have a one-car or a two-car garage. The properties sold from April 2018 to August 2020 for prices ranging from \$12,342 to \$146,500 or from \$3.69 to \$33.79 per square foot of building area, land included. Based on this evidence, the appellant requested the combined assessment of the subject's two parcels be reduced to \$8,480, reflecting a market value of \$84,800 or \$21.22 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 appellant also submitted a copy of the decision of the board of review that revealed a final assessment for each of the parcels under appeal. The subject parcels have a combined total assessment of \$15,503 reflecting a market value of \$155,030 or \$38.80 per square foot of building area, including land, when using the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%.

The board of review submitted its "Board of Review Notes on Appeal" providing assessment information on only one parcel under appeal.

In support of its contention of the correct assessment the board of review submitted information on three comparable properties that have the same property classification code as the subject and are located in Harvey or Blue Island, one of which has the same assessment neighborhood code as the subject. The comparables have sites that range in size from 4,167 to 4,818 square feet of land area. The comparables are improved with one-story or two-story multi-family buildings of masonry exterior construction ranging in size from 2,150 to 4,963 square feet of building area. The buildings are 54 to 62 years old. Two comparables each have a full basement that are finished with an apartment and comparable #1 has a concrete slab foundation. Each comparable has two to six bathrooms. Comparable #2 has central air conditioning and a two-car garage. The properties sold from August to October 2020 for prices ranging from \$83,000 to \$230,000 or from \$38.60 to \$46.34 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 finds none of the comparables are truly similar to the subject due to significant differences in location, dwelling size, age and/or features. The Board finds the appellant's comparables are more similar

to the subject in location but three of the four comparables are less similar to the subject in age. Additionally, three of the four appellant's comparables have sale dates that occurred in 2018, less proximate in time to the January 1, 2020 assessment date at issue than other sales in the record. The Board finds the board of review comparables sold more proximate to the assessment date at issue and are similar to the subject in age but two of the three comparables have different assessment neighborhood codes and/or are located in a different city when compared to the subject. Nevertheless, these seven comparables sold from April 2018 to October 2020 for prices ranging from \$12,342 to \$230,000 or from \$3.69 to \$46.34 per square foot of building area, including land. The subject's assessment reflects an estimated market value of \$155,030 or \$38.80 per square foot of building area including land, which falls within the range established by the comparable sales in the record. After considering adjustments to the comparables for differences in location, building size, age and features when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment is 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



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Mark Feyman, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602