



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

APPELLANT: Mark Feyman  
DOCKET NO.: 20-43745.001-R-1  
PARCEL NO.: 29-18-218-049-0000

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 **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:** \$1,573  
**IMPR.:** \$17,212  
**TOTAL:** \$18,785

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 5,532 square feet of building area. The building is approximately 60 years old. Features of the building include a basement finished with an apartment and six bathrooms. The property has an approximately 5,720 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 properties that have the same assessment neighborhood code as the subject. The appellant disclosed that three of the four comparables are located in Harvey and one comparable is located in Calumet City. The comparables have sites that range in size from 4,300 to 7,561 square feet of land area. The comparables are improved

with buildings of frame or masonry exterior construction ranging in size from 2,112 to 4,336 square feet of building area. The dwellings are from 13 to 117 years old. The comparables each have a basement, one of which is finished as an apartment and one comparable has a concrete slab foundation. Each comparable has two to five bathrooms and two comparables each have a 1-car or a 2-car garage. The properties sold from June 2018 to August 2020 for prices ranging from \$50,000 to \$162,000 or from \$22.12 to \$56.25 per square foot of building area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$18,785, reflecting a market value of \$187,850 or \$33.96 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 \$21,794. The subject's assessment reflects a market value of \$217,940 or \$39.40 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%.

In support of its contention of the correct assessment the board of review submitted information on three comparable properties that are located in Harvey and have the same assessment neighborhood code and property classification code as the subject. Sales data was provided for comparables #2 and #3. Since no sales data was provided for comparable #1 to address the appellant's overvaluation argument, this property will not be further discussed in this analysis. Comparables #2 and #3 have sites that contain 6,020 and 4,472 square feet of land area that are improved with two-story buildings of frame or masonry exterior construction with 2,108 and 2,172 square feet of building area, respectively. Each comparable has a full unfinished basement, two bathrooms and a 2-car or a 2.5-car garage. The properties sold in August 2017 and May 2018 for prices of \$3,000 and \$57,000 or for \$1.42 and \$26.24 per square foot of building area, land included, respectively. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains six suggested comparable sales for the Board's consideration, none of which are truly similar to the subject. The Board finds the appellant's comparables differ from the subject in location, building size, age and/or features, whereas the board of review comparables differ from the subject in dwelling size, age and/or have sale dates which occurred less proximate in time to the assessment date at issue. Nevertheless, the Board gives less weight to the appellant's comparables #2, #3 and #4, along with board of review comparables #2 and #3 due to their substantially smaller building sizes when compared to the subject. Additionally, the appellant's comparable #2 has a dissimilar concrete slab foundation, the appellant's comparable

#4 is located in a different city and board of review comparable #2 has a sale date which occurred 28 months prior to the lien date at issue and is thus less likely to be indicative of the subject's market value as of the January 1, 2020 assessment date.

The Board finds on this limited record that the best evidence of market value is appellant's comparable sale #1. The Board finds this comparable has a basement apartment like the subject and is similar to the subject in location and design. However, the Board finds the comparable building is 22% smaller in size and has a fewer number of bathrooms when compared to the subject building, suggesting upward adjustments would be required to make this comparable more equivalent to the subject. Conversely, the comparable building is 37 years newer in age when compared to the subject, suggesting a downward adjustment would be required for the age difference. 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 \$217,940 or \$39.40 per square foot of building area, including land, which is greater than the most similar comparable sale in the record both in terms of overall market value and on a price per square foot basis. After considering adjustments to the best comparable for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is excessive. Therefore, based on this limited record, the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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

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