



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

APPELLANT: Mohammed Bages
DOCKET NO.: 20-44347.001-R-1
PARCEL NO.: 28-17-412-056-1052

The parties of record before the Property Tax Appeal Board are Mohammed Bages, 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: \$1,766
IMPR.: \$5,023
TOTAL: \$6,789

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 consists of a condominium unit with a .6400%¹ ownership interest in the common elements of the condominium property containing 166 residential units. The property has 324,810 square feet of land area and is located in Oak Forest, Bremen Township, Cook County. The subject 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 a grid analysis with information on the subject and two comparable sales that have the same assessment neighborhood code as the subject. The appellant reported the two

¹ The Board finds the best evidence of the subject's percentage of ownership interest in the common elements of the condominium property was provided by the board of review.

comparables each have a .64% ownership interest in the common elements of the condominium property. The comparables sold in April and August 2020 for prices of \$57,000 and \$80,000. The appellant prepared a sales analysis and calculated the total consideration of the two comparable sales to be \$140,000. The appellant applied a personal property adjustment factor of 5% which was deducted from the total consideration of the sales to arrive at a total adjusted consideration of \$133,000. The total adjusted consideration was divided by the percentage interest of ownership of the units that sold of 1.28% to arrive at an indicated full value for the condominium property of \$10,390,625. The appellant contends the subject property has .55% ownership interest of ownership in the condominium property. Applying the subject's percentage of ownership in the condominium property to the estimated value of the property results in a market value estimate of \$57,148 and an assessment of \$5,715, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$6,789. The subject's assessment reflects a market value of \$67,890, 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 two separate sales analyses prepared by Boetius Turek, an analyst with the Cook County Board of Review. For ease of reference, the Board has labeled the sales analysis that has sales data for eight properties that occurred from 2019 and 2020 as Exhibit #1 and the sales analysis that has sales data for 16 properties that occurred from 2019 to 2021 as Exhibit #2.

With respect to Exhibit #1, the analyst provided sales data on eight comparable sales of residential units in the subject's condominium property, which included the sales submitted by the appellant. The sales occurred from May 2019 to November 2020 for prices ranging from \$59,000 to \$144,000. The analyst reported a total consideration for these eight sales of \$637,700. The total consideration was divided by the percentage of interest of ownership in the condominium property for the units that sold of 5.4000% to arrive at an indicated full value for the property of \$11,809,259. The analyst then applied the percentage of interest of the unit under appeal of .6400% to arrive at a full value \$75,579 and an assessment of \$7,558, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

With respect to Exhibit #2, the analyst provided sales data on 16 comparable sales of residential units in the subject's condominium property, which included the two sales submitted by the appellant. The sales occurred from May 2019 to May 2021 for prices ranging from \$59,000 to \$144,000. The analyst reported a total consideration for these 16 sales of \$1,259,515. The total consideration was divided by the percentage of interest of ownership in the condominium property for the units that sold of 10.1600% to arrive at an indicated full value for the property of \$12,396,801. The analyst then applied the percentage of interest of the unit under appeal of .6400% to arrive at a full value \$79,339 and an assessment of \$7,934, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

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 appellant provided a sales analysis of two comparable sales, while the board of review provided two separate sales analyses, where Exhibit #1 contained eight comparable sales, including the appellant's two comparable sales and Exhibit #2 contained 16 comparables sales, including the appellant's two comparable sales, to support their respective positions before the Property Tax Appeal Board.

The Board gives less weight to the estimated market value as indicated in the appellant's sales analysis as the appellant only utilized two sales in the analysis, when the record disclosed there were eight available comparable sales in the condominium property. Moreover, the appellant applied a 5% personal property adjustment factor which was deducted from the total consideration of the sales prices in the analysis but failed to provide any evidence to support the adjustment. Likewise, the Board gives less weight to the estimated market value as shown in the board of review condominium sales analysis identified as Exhibit #2. The Board finds eight of the 16 sales chosen by the board of review analyst occurred from February to May 2021 or from 14 to 17 months after the lien date at issue and are thus less likely to be indicative of the subject's market value as of the January 1, 2020 assessment date.

The Board finds the best evidence of market value to be the board of review condominium analysis identified as Exhibit #1. The Board finds the eight sales utilized in this analysis occurred more proximate to the January 1, 2020 assessment date. The analyst determined the subject had a full value \$75,579 and an assessment of \$7,558, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%, which is greater than the subject's estimated market value of \$67,890 as reflected by its assessment. Based on this evidence, the Board finds a reduction in the subject's assessment is not 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



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: June 18, 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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