



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

APPELLANT: First Midwest Bank Trust No. 2939
DOCKET NO.: 20-48587.001-R-1
PARCEL NO.: 18-04-232-040-0000

The parties of record before the Property Tax Appeal Board are First Midwest Bank Trust No. 2939, 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: \$7,812
IMPR.: \$40,909
TOTAL: \$48,721

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a tax year 2019 Final Administrative Decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) in order to challenge 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 dwelling of masonry exterior construction with 3,464 square feet of living area. The dwelling is approximately 118 years old. Features of the home include a partial basement with a formal recreation room, central air conditioning and a fireplace. The property has a 12,500 square foot site and is located in LaGrange, Lyons 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 assessment inequity as to the improvement assessment as the basis of the appeal. In support of this argument, the appellant submitted information on seven equity comparables, where comparable #1 is located in the same neighborhood code as the subject and within .22 of a mile from the subject. The remaining comparables are located in a different neighborhood code and from .20 to .39 of a mile from the subject. The comparables consist of

class 2-11 two-story dwellings of stucco or masonry exterior construction ranging in age from 16 to 120 years old. The homes range in size from 3,128 to 4,357 square feet of living area. Four dwellings have a full basement, three of which have either a formal recreation room or an apartment, and comparables #2, #4 and #5 each have a concrete slab foundation. Two homes each have central air conditioning and one home has a fireplace. Three comparables have either a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$32,337 to \$47,274 or from \$10.34 to \$11.17 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$37,261 or \$10.76 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$48,721. The subject property has an improvement assessment of \$40,909 or \$11.81 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables, where comparable #1 is located in the same neighborhood code as the subject and on the same block as the subject. The remaining comparables are each located in different neighborhood codes than the subject. The comparables consist of class 2-11 two-story dwellings of masonry exterior construction ranging in age from 46 to 48 years old. The homes range in size from 3,110 to 4,142 square feet of living area. The dwellings have either a full or a partial basement, two of which have formal recreation rooms. The comparables have improvement assessments ranging from \$49,597 to \$52,028 or from \$11.97 to \$16.24 per square foot of living area.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of ten equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #2, #4 and #5 which have concrete slab foundations as compared to the subject's partial basement with a formal recreation room.

While none of the remaining comparables are truly similar to the subject in most respects, on this record, the Board finds the best evidence of assessment equity to be appellant's comparables #1, #3, #6 and #7 along with the board of review comparables. These comparables have improvement assessments ranging from \$32,337 to \$52,028 or from \$10.34 to \$16.24 per square

foot of living area. The subject's improvement assessment of \$40,909 or \$11.81 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments for location, age, dwelling size, lack of a finished basement, lack of air conditioning, lack of a fireplace and/or downward adjustments for a garage which is not a feature of the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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:

May 21, 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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