



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

APPELLANT: John Brannen  
DOCKET NO.: 21-49017.001-R-1  
PARCEL NO.: 14-33-409-007-0000

The parties of record before the Property Tax Appeal Board are John Brannen, 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:** \$15,938  
**IMPR.:** \$44,062  
**TOTAL:** \$60,000

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 2021 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 3-story apartment building of masonry exterior construction with 2,388 square feet of building area. The building is approximately 153 years old. Features of the building home include a full unfinished basement. The property has a 1,275 square foot site and is located in Chicago, North Chicago Township, Cook County. The property is 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 an appraisal of the subject property estimating a retrospective market value of \$575,000 as of January 1, 2021. The appraisal was prepared by William P. Neberieza, a Certified General Real Estate Appraiser. The property rights appraised were fee simple. The intended use of the appraisal was to estimate the market value of subject property for Ad Valorem Value for the purpose of a uniform assessment and resulting equitable Real Estate

Taxes only. The appraiser considered the subject property was in average condition and suffers from external obsolescence due to its location between two heavily traveled streets causing excessive noise and pollution. The appraiser also noted the subject property lacks typical neighborhood amenities such as central air conditioning or a garage.

In estimating the value of the subject property, the appraiser developed sales comparison approach to value utilizing four comparable sales that are located in Chicago and approximately 1.48 to 2.12 miles from the subject property. The comparables have sites ranging in size from 3,125 to 3,862 square feet of land area and are improved with apartment buildings ranging in size from 3,252 to 4,356 square feet of building area. The buildings were built from 1895 to 1910 or approximately 111 to 126 years old. Two comparables have central air conditioning and three comparables each have a 2-car garage. The comparables sold from March to December 2020 for prices ranging from \$865,000 to \$1,000,000 or from \$229.56 to \$265.99 per square foot of living area, including land. After considering adjustments to the comparables for differences in location and amenities when compared to the subject, the appraiser arrived at an estimated market value of \$575,000 as of January 1, 2021. Based on this evidence, the appellant requested a reduction in the subject property's total assessment to \$60,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$72,999. The subject's assessment reflects a market value of \$729,990 or \$305.69 per square foot of living area, including land, when applying the level of assessment of 10% for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparables. The board of review did not report any sale date for Comparable #2 which does not address the appellant's overvaluation argument and therefore, it will not be further addressed. Comparables #1, #3 and #4 located in the same assessment neighborhood code as the subject. The comparables have sites with either 2,976 or 3,125 square feet of land area and are improved with 2-story or 3-story buildings of masonry exterior construction ranging in size from 3,063 to 3,765 square feet of building area. The buildings are 26 to 138 years old and have full basements, two of which are finished with a recreation room or an apartment. One comparable has central air conditioning and three fireplaces. One comparable has a 1.5-car garage. Comparables #1 and #3 sold in January 2020 or February 2021 for prices of \$1,201,887 and \$100,000 or \$324.13 and \$26.56 per square foot of building area, respectively. Comparable #4 sold in February 2021 for \$1. Based on this evidence the board of review requests 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 an appraisal submitted by the appellant and three comparable sales submitted by the board of review to support their respective positions before the Board.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appraiser applied adjustments to the comparables for differences from the subject to arrive at an estimated market value of \$575,000. The subject's assessment reflects a market value of \$729,990 which is above the appraised value. The Board gave less weight to the board of review comparable sale #1 which is a significantly newer building than the subject property. The Board gives less weight to board of review comparable sales #3 and #4 which are considered outliers as they sold considerably less than the other sales in the record. In addition, comparable #3 sold for \$1 which calls into question the arm's length nature of the transaction. Based on this evidence the Board finds a reduction in the subject's assessment commensurate with the appellant's request is 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.



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Chairman



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Member

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Member



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Member



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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: April 15, 2025



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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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