



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

APPELLANT: Dragos Aldea
DOCKET NO.: 21-49027.001-R-1
PARCEL NO.: 13-01-202-015-0000

The parties of record before the Property Tax Appeal Board are Dragos Aldea, 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: \$12,379
IMPR.: \$50,625
TOTAL: \$63,004

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 multi-family building of masonry exterior construction with 5,868 square feet of building area. The building is approximately 93 years old. Features of the building include a full basement finished with an apartment and a 2-car garage. The property has a 4,125 square foot site and is located in Chicago, Jefferson 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 regarding the improvement and overvaluation as the bases of the appeal. In support of the inequity argument the appellant submitted information on seven comparables with the same assessment neighborhood code as the subject. The comparables are class 2-11 properties improved with 2-story and 3-story or higher multi-family buildings of masonry exterior construction ranging in size from 5,196 to 7,110 square feet of

building area. The comparables are 82 to 95 years old and have full basements, four of which are finished with a recreation room or an apartment. Two comparables each have three fireplaces. Each comparable has a 2-car or a 3-car garage. The comparables have improvement assessments of \$24,230 to \$42,724 or from \$5.54 to \$7.63 per square foot of building area.

In support of the overvaluation argument the appellant submitted information on four comparable sales located within the same assessment neighborhood code as the subject. The comparables are class 2-11 properties with sites containing 4,125 or 5,580 square feet of land area and are improved with multi-family buildings ranging in size from 4,216 to 5,289 square feet of building area. The buildings are 94 or 99 years old and have full unfinished basements. Each comparable has one fireplace and a 2-car to a 3.5-car garage. The comparables sold from March 2019 to October 2021 for prices ranging from \$150,000 to \$421,460 or from \$32.89 to \$99.97 per square foot of building area, including land.

Based on the foregoing 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 \$63,004. The subject's assessment reflects a market value of \$630,004 or \$107.36 per square foot of building area, including land when using the Cook County Real Property Assessment Classification Ordinance for class 2 property of 10%. The subject property has an improvement assessment of \$50,625 or \$8.63 per square foot of building area.

In support of its contention of the correct assessment the board of review submitted information on four comparables with the same assessment neighborhood code as the subject. The comparables are class 2-11 properties that have sites ranging in size from 4,045 to 4,125 square feet of land area and are improved with 3-story multi-family buildings of masonry exterior construction ranging in size from 4,248 to 5,866 square feet of building area. The comparables are 93 to 95 years old and have full basements, two of which are finished with a recreation room or an apartment. Two comparables have central air conditioning. Each comparable has a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$39,865 to \$69,724 or from \$8.78 to \$11.89 per square foot of building area. Comparables #1, #2 and #3 sold from November 2020 to December 2021 for prices ranging from \$700,000 to \$760,000 or from \$130.94 to \$177.73 per square foot of building area, including land. Based on this evidence the board review requests confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part 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 record contains 12 equity comparables for the Board's consideration. The Board gives less weight to appellant's comparables #7 and #8 as well as board of review comparable #2 due to significant differences in building size when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparables #1 through #6 along with board of review comparables #1, #3 and #4 which are most similar in building size and have varying degrees of similarity in age and features. These comparables have improvement assessments ranging from \$32,625 to \$69,724 or from \$6.09 to \$11.89 per square foot of building area. The subject's improvement assessment of \$50,625 or \$8.63 per square foot of building area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences when compared to 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 warranted.

The appellant also 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 eight comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparable sales and board of review comparable #2 due to differences in building size and/or they sold in 2018 or 2019 which are less proximate in time to the January 1, 2020, assessment date than the other sales in the record.

The Board finds the best evidence of market value to be board of review comparables #1 and #3 which sold more proximate in time to the assessment date and overall are most similar to the subject in location, age, building size and features. These comparables sold in November 2020 and June 2021 for prices of \$700,000 and \$760,000 or \$130.94 and \$135.57 per square foot of building area, including land, respectively. The subject's assessment reflects a market value of \$630,004 or \$107.36 per square foot of building area, including land, which falls below the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not prove by a preponderance of the evidence that a reduction in the subject's assessment 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.



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: _____

January 21, 2025



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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