



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

APPELLANT: Nick Fiorani
DOCKET NO.: 21-51596.001-R-1
PARCEL NO.: 13-22-102-075-0000

The parties of record before the Property Tax Appeal Board are Nick Fiorani, the appellant(s), 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: \$17,875
IMPR.: \$48,124
TOTAL: \$65,999

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

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 is improved with a single-family, two-story dwelling of frame construction containing 2,092 square feet of living area. As of the instant lien date the subject was approximately 15 years old. Features of the home include a full formal recreation room basement, air conditioning, and a two-car garage. The subject has a 5,586 square foot site and is in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant's appeal is based on overvaluation and assessment equity.

With respect to the overvaluation argument, Appellant submitted information on four suggested sales comparables. They are wood construction. All have air conditioning. As of the lien date, Appellant's comparables ages range from 14 to 15 years old. Appellant's comparables range in

size from 2,092 square feet to 2,102 square feet of living area. The comparables have sites ranging in size from 1,526 to 2,620 square feet of land area. The comparables sold between May 1, 2019 and July 14, 2021 for prices ranging from \$472,250 to \$539,000 or from \$224.67 to \$256.42 per square foot of living area, including land. Each comparable has the same neighborhood code as the subject property, with no further evidence of proximity to the subject provided.

With respect to the equity argument, Appellant submitted information on eight suggested comparable three- and 3-plus-story dwellings. They are all wood construction. All have air conditioning. As of the lien date, Appellant's comparables ages range from 15 to 16 years old. Appellant's comparables are all 2,102 square feet of living area and improvement assessments from \$15.54 to \$16.33 per square foot of living area. Each comparable has the same neighborhood code as the subject property, with proximities ranging from .01 miles to .07 miles from the subject.

The Cook County Board of Review (BOR) submitted its "Board of Review Notes on Appeal." The subject's assessment is \$65,999 which reflects a market value of \$659,990 using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The subject's assessment reflects a market value of \$315.48 per square foot of living area, including land. The subject also has a total improvement assessment of \$48,124 or \$23.000 per square foot of living area.

With respect to the overvaluation argument, the BOR submitted two sales comparables in support of its final assessment. The properties are described as two-story dwellings. These BOR comparables share the same neighborhood code as the subject and are located on the same block as the subject. They are frame construction. Both have air conditioning. As of the lien date the BOR comparables are 15 years old. The comparables contain 2,092 square feet of building area. The comparables have sites that range from 4,936 to 4,987 square feet of land area. The comparables sold between July 24, 2019 and June 12, 2020 for prices between \$675,000 and \$705,000 or \$322.66 and \$337.00 per square foot of living area, including land.

With respect to the equity argument, the BOR submitted three equity comparables in support of its final assessment. The properties are described as two- and three-story dwellings, two located on the same block as the subject and one within a quarter mile. All three BOR comparables share the same neighborhood code as the subject. Two are frame construction, and one is frame-and-masonry construction. All have air conditioning. As of the lien date the BOR comparables range from 15 to 19 years old. The comparables range from 2,009 to 2,092 square feet of building area and have improvement assessments ranging from \$15.99 to \$18.65 per square foot of building area.

Conclusions of Law

Appellant contends assessment inequity and that the market value of the subject property is not accurately reflected in its assessed valuation as the bases of the appeal.

Overvaluation

When market value is the basis of the appeal, the value of the property must be proven by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e). Proof of market value may con-

sist of an appraisal of the subject property, a recent sale, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c).

With respect to the overvaluation argument, the Board finds Appellant did **not** meet this burden of proof, and a reduction in the subject's assessment is **not** warranted.

The Board finds Appellant comparable 3 and BOR comparables 2 and 3 are most similar to the subject in location, size, style, exterior construction, features, age and land area. These properties also sold proximate in time to the assessment date at issue. Due to the similarities to the subject, these comparables received the most weight in the Board's analysis. The Board takes particular note that the subject's lot size is 5,586 square feet of land, BOR comparables 2 and 3 are 4,987 and 4,936 square feet of land, and Appellant comparable 3 is 2,620 square feet of land while all other Appellant sales comparables are under 2,000 square feet of land. The comparables sold for prices ranging from \$492,500 to \$705,000 or from \$234.30 to \$337.000 per square foot of living area, including land. The subject's assessment reflects a market value of \$315.48 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this record the Board finds the appellant did **not** demonstrate by a preponderance of the evidence that the subject was overvalued, and a reduction in the subject's assessment is **not** justified.

Equity

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 Appellant did **not** meet this burden of proof and a reduction in the subject's assessment is **not** warranted.

The Board finds the best evidence of assessment equity to be BOR comparables 2 and 3 and Appellant comparable 8. The three comparables have similar improvements to the subject. All three comparables are frame (described as "wood" by Appellant), same as the subject. All three comparables are within a year of the subject's age. Appellant comparable 8 is within .07 miles of the subject; the BOR comparables are on the same block as the subject. The Board takes particular note that the subject's lot size is 5,586 square feet of land; BOR comparables 2 and 3 have lot sizes of 4,987 and 4,936 square feet of land; Appellant comparable 8 has 3,853 square feet of land. No other Appellant comparable has more than 2,000 square feet of land.

These comparables have improvement assessments that range from \$15.54 to \$18.65 per square foot of living area. The subject's improvement assessment of \$23.00 per square foot of living area falls within the range established by the best comparables in this record.

Based on this record, the Board finds 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: _____

February 18, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Nick Fiorani, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602