



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

APPELLANT: James Palarczyk
DOCKET NO.: 21-51916.001-R-1 through 21-51916.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are James Palarczyk, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-51916.001-R-1	19-10-324-039-0000	4,262	14,738	\$19,000
21-51916.002-R-1	19-10-324-040-0000	3,125	13,875	\$17,000

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 2-story building of masonry exterior construction with 2,600 square feet of living area. The building is 56 years old. Features of the building include an unfinished full basement and a 2-car garage. The property has a 7,387 square foot site and is located in Chicago, Lake 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales located within the same neighborhood code as the subject. The comparables have sites ranging in size from 3,125 to 3,990 square feet of land area that are improved with class 2-11 buildings of wood or masonry exterior construction ranging in size from 2,418 to 2,607 square feet of building area. The buildings range in age from 61 to 108 years old. Three comparables have full basements, one of which has

a formal recreation room, and one comparable has a slab foundation. Two comparables have either a 1-car or a 1.5-car garage. The comparables sold from January 2019 to October 2021 for prices ranging from \$265,000 to \$300,000 or from \$109.59 to \$127.28 per square foot of building area, including land. Based on this evidence the appellant requested the subject's assessment be reduced to \$30,880.

The board of review submitted its "Board of Review Notes on Appeal." The subject has a total assessment of \$36,000, which reflects a market value of \$360,000 or \$138.46 per square foot of building area, including land, 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 information on four comparable properties located within the same neighborhood code as the subject. The comparables have sites with 3,125 or 3,780 square feet of land area that are improved with class 2-11 buildings of frame or masonry exterior construction ranging in size from 2,202 to 2,600 square feet of building area. The buildings range in age from 31 to 96 years old. Three comparables have full basements, one of which has a formal recreation room, and one comparable has a slab foundation. One comparable has central air conditioning and three comparables have either a 2-car or a 2.5-car garage. Two comparables sold in December 2020 and August 2021 for prices of \$385,000 and \$380,000 or \$148.53 and \$156.38 per square foot of building area, including land, respectively. 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 Board finds the best evidence of market value to be appellant's comparable sales #1 and #4, as well as the board of review's comparable sales #2 and #3. These comparables sold for prices ranging from \$265,000 to \$385,000 or from \$109.59 to \$156.38 per square foot of building area, including land. The subject's assessment reflects a market value of \$360,000 or \$138.46 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. The Board gave less weight to the appellant's comparables #2 and #3, due to their lack of a basement foundation and/or their sale date occurring greater than 12 months prior to the January 1, 2021 assessment date at issue. The Board gave less weight to the board of review's comparables #1 and #4, due to their lack of sales information, which is necessary when responding to the overvaluation argument brought by the appellant. In addition, the board of review's comparable #4 lacks a basement foundation when compared to the subject. 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: _____

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

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