

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Ranko Ristic
DOCKET NO.: 21-51954.001-R-1
PARCEL NO.: 13-08-206-023-0000

The parties of record before the Property Tax Appeal Board are Ranko Ristic, 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: \$8,188 **IMPR.:** \$34,816 **TOTAL:** \$43,004

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 2-story building of masonry exterior construction with 2,865 square feet of building area. The building is approximately 65 years old. Features include a basement finished with a recreation room and a 2-car garage. The property has a 4,092 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 both assessment equity concerning the improvement and overvaluation as the bases of the appeal. In support of these arguments, the appellant submitted information on nine comparables located within the same assessment neighborhood code as the subject and within 0.22 of a mile from the subject. The comparables are improved with class 2-11 buildings of masonry or wood exterior construction ranging in size from 2,327 to 3,349 square feet of

building area. The buildings range in age from 65 to 102 years old. Eight comparables each have a basement, seven of which are finished with an apartment, and one comparable has a slab foundation. Four comparables have central air conditioning. Eight comparables have a 2-car or a 3-car garage. The comparables have improvement assessments ranging from \$19,312 to \$38,560 or from \$8.24 to \$11.54 per square foot of building area. Three comparables have sites ranging in size from 2,883 to 4,216 square feet of land area and sold from October 2003 to June 2022 for prices ranging from \$155,000 to \$425,000 or from \$66.61 to \$157.47 per square foot of building area, including land. Based on this 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 \$43,004. The subject's assessment reflects a market value of \$430,040 or \$150.10 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%. The subject has an improvement assessment of \$34,816 or \$12.15 per square foot of building area.

In support of its contention of the correct assessment the board of review submitted information on four comparables located within the same assessment neighborhood code as the subject and within 0.25 of a mile or on the same block as the subject. The comparables have 3,720 or 4,620 square foot sites that are improved with 2-story, class 2-11 buildings of masonry or frame exterior construction ranging in size from 2,400 to 2,578 square feet of building area. The buildings range in age from 64 to 103 years old. Each comparable has a basement, two of which are finished with a recreation room, and a 2-car garage. One comparable has central air conditioning. The comparables have improvement assessments ranging from \$27,760 to \$44,560 or from \$11.57 to \$17.33 per square foot of building area. The comparables sold from September 2018 to September 2021 for prices ranging from \$390,000 to \$605,000 or from \$162.50 to \$234.68 per square foot of building area, including land. Based on this evidence the board of review requested 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.Adm.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.Adm.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 a total of thirteen equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #2 through #9 and the board of review's

¹ The appellant also reported three additional sales for \$0 or \$1, suggesting these were not arm's length sales reflective of market value, and the Board shall not further consider these three sales.

comparables #1 and #4, due to substantial differences from the subject in building size, foundation type, and/or age.

The Board finds the best evidence of assessment equity to be the appellant's comparable #1 and the board of review's comparables #2 and #3, which are more similar to the subject in building size, age, location, and features. These comparables have improvement assessments ranging from \$34,216 to \$44,560 or from \$11.54 to \$17.33 per square foot of building area. The subject's improvement assessment of \$34,816 or \$12.15 per square foot of building area falls within the range established by the best comparables in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's assessment was inequitably assessed and no reduction in the subject's improvement assessment is justified.

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.Adm.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.Adm.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment for overvaluation is not warranted.

The record contains a total of seven comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables and the board of review's comparables #1 and #4, which sold less proximate in time to the assessment date than the other sales in this record and/or differ substantially from the subject in building size and/or age.

The Board finds the best evidence of market value to be the board of review's comparables #2 and #3, which sold more proximate in time to the assessment date and are more similar to the subject in building size, age, location, site size, and most features. These comparables sold for prices of \$530,000 and \$605,000 or \$206.15 and \$234.68 per square foot of building area, including land. The subject's assessment reflects a market value of \$430,040 or \$150.10 per square foot of building area, including land, which is below the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, 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.

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	Chairman
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Member	Member
Dan Dikini	
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:	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 <u>PETITION AND EVIDENCE</u> 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

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COUNTY

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