



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

APPELLANT: Simeon Nockov
DOCKET NO.: 21-54990.001-R-1
PARCEL NO.: 13-08-329-001-0000

The parties of record before the Property Tax Appeal Board are Simeon Nockov, the appellant; 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: \$10,926
IMPR.: \$21,074
TOTAL: \$32,000

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 is improved with a two-story dwelling of masonry exterior construction containing 1,369 square feet of living area. The dwelling is approximately 75 years old. Features of the property include an unfinished full basement, central air conditioning, one bathroom, and a two-car garage. The property has a 5,463 square foot site located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-05 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 three comparable sales improved with a 1-story dwelling, a 1.5-story dwelling, or a 2-story dwelling of masonry or frame exterior construction that range in size from 1,503 to 1,980 square feet of living area.¹ The homes range in age from 66 to 93 years

¹ The appellant submitted copies of the Multiple Listing Service listing sheets associated with each comparable from which some of the descriptive details were obtained by this Board.

old. Each comparable has a full basement with two having finished area. The Multiple Listing Service (MLS) listing sheet for comparable #1 stated the home has a finished basement with two bedrooms, a kitchen, and separate gas/electric. The appellant described this home as having 2-units. The comparables have 1½, 2 or 3 bathrooms and a detached 1-car, 2-car, or 2.5-car garage. Comparable #3 has two fireplaces. The MLS listing sheet associated with comparable #2 describes the home as needing repairs and was being sold as-is. The MLS listing sheet for comparable #3 states in part, "Rehabbers, search no more, because this home has hardwood floors underneath all the carpeting." These properties have the same assessment neighborhood code as the subject property with sites that range in size from 3,750 to 5,580 square feet of land area. The sales occurred in April and June 2022 for prices ranging from \$280,055 to \$315,000 or from \$151.52 to \$209.58 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$29,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$32,000. The subject's assessment reflects a market value of \$320,000 or \$233.75 per square foot of living area, including land, when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-05 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with two-story dwellings of frame, masonry, or frame and masonry exterior construction that range in size from 1,150 to 2,000 square feet of living area. The homes range in age from 64 to 81 years old. One comparable has a slab foundation and three comparables have full or partial basements with one having finished area. One comparable has central air conditioning, each comparable has 1 or 2 bathrooms, and each comparable has a 1-car or a 2-car garage. These properties have sites ranging in size from 4,836 to 5,580 square feet of land area. The comparables have the same classification code and neighborhood code as the subject property. The sales occurred from April 2019 to October 2021 for prices ranging from \$250,000 to \$348,000 or from \$125.00 to \$302.61 per square foot of living area, land included.

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 parties submitted information on seven comparable sales to support their respective positions. The Board gives less weight to the appellant's comparable sales for the following reasons: comparable #1 is described as being a 2-unit property differing from the subject's single-family configuration; comparable #2 is described as being in need of repair whereas there was no evidence that the subject dwelling is in a similar condition; comparable #2 is approximately 45% larger than the subject dwelling further undermining its similarity to the subject property; and appellant's comparable #3 differs from the subject home in style being a

one-story dwelling detracting from its likeness to the subject property. The Board gives little weight to board of review comparable #4 due to differences from the subject dwelling in size as this home is approximately 46% larger than the subject dwelling. The Board finds the best evidence of market value to be board of review comparable sales #1, #2 and #3, which are relatively similar to the subject in location, style, age and size. Board of review comparables #1 and #2 have no central air condition, as does the subject property, and each property has a smaller garage than the subject property, suggesting each would require upward adjustments to make them more equivalent to the subject property for these features. Additionally, board of review comparable #1 has a slab foundation, unlike the subject's full basement, suggesting this property would also require an upward adjustment to make it more equal to the subject for this amenity. These three comparables sold from April 2019 to October 2021 for prices ranging from \$310,500 to \$348,000 or from \$245.65 to \$302.61 per square foot of living area, including land. Of the best comparables in this record, board of review comparable #3 sold most proximate in time to the assessment date for a price of \$348,000 or \$302.61 per square foot of living area, including land. The subject's assessment reflects a market value of \$320,000 or \$233.75 per square foot of living area, including land, which is within the overall price range but below the range on a per square foot of living area basis as established by the best comparable sales in this record. The Board finds these sales, after considering the suggested adjustments, demonstrate the subject property is not overvalued. Based on this evidence the Board finds the assessment of the subject property as established by the board of review is correct 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: June 18, 2024



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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