

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jack Mozdzierz
DOCKET NO.: 22-21491.001-R-1
PARCEL NO.: 13-18-307-026-0000

The parties of record before the Property Tax Appeal Board are Jack Mozdzierz, 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 <u>no change</u> 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:** \$5,031 **IMPR.:** \$30,616 **TOTAL:** \$35,647

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 2022 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 one-story dwelling of masonry exterior construction with 1,344 square feet of living area. The dwelling is approximately 31 years old. Features of the dwelling include a full basement that is finished with a formal recreation room, <sup>1</sup> 2½ bathrooms, central air conditioning and a 2-car garage. The property has a 3,870 square foot site and is located in Harwood Heights, Norwood Park Township, Cook County. The subject is classified as a class 2-03 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 comparables that have the same property classification

<sup>&</sup>lt;sup>1</sup> The board of review disclosed the subject dwelling has a formal recreation room in the basement, which was not refuted by the appellant.

code and assessment neighborhood code as the subject. The comparables are located within .3 of a mile from the subject property and have sites that range in size from 3,567 to 4,902 square feet of land area. The comparables are improved with one-story dwellings of frame, wood or stucco exterior construction ranging in size from 1,052 to 1,346 square feet of living area. The dwellings are from 69 to 92 years old. The comparables each have a full or partial unfinished basement and either 1 or 1½ bathrooms. Three comparables each have either a 2-car or a 2.5-car garage. The properties sold from February 2021 to April 2022 for prices ranging from \$206,000 to \$235,000 or from \$170.88 to \$195.82 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$25,631, reflecting a market value of \$256,310 or \$190.71 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$35,647. The subject's assessment reflects a market value of \$356,470 or \$265.23 per square foot of living 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 three comparable properties that have the same property classification code and assessment neighborhood code as the subject. Sales data was provided for comparables #2 and #3. Since no sales data was provided for comparable #1 to address the appellant's overvaluation argument, this property will not be further discussed in this analysis. Comparables #2 and #3 are located approximately ¼ of a mile from the subject or within the subject's subarea. The comparables have sites that contain 3,125 or 5,095 square feet of land area. The comparables are improved with one-story or one and one-half-story dwellings of frame or masonry exterior construction with 1,120 or 1,336 square feet of living area. The dwellings are 22 or 95 years old. The comparables each have a full basement that is finished with a formal recreation room, 1½ or 3 bathrooms, central air conditioning and a 2-car garage. The properties sold in April and June 2022 for prices of \$362,000 and \$454,000 or for \$323.21 and \$339.82 per square foot of living area, land included. 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 record contains six comparable sales for the Board's consideration. The Board finds none of the comparables are truly similar to the subject due to significant differences in age, dwelling size and/or features when compared to the subject. The Board finds the appellant's comparable dwellings are considerably older in age with a fewer number of bathrooms and each lacks central

air conditioning, basement finish and/or a garage, which are features of the subject. Additionally, three of the appellant's comparables are somewhat smaller in dwelling size, when compared to the subject. These differences suggest upward adjustments would be required to make the comparables more equivalent to the subject. Likewise, board of review comparable #2 has a considerably older dwelling that is a one and one-half-story design, when compared to the subject's one-story design and board of review comparable #3 has a somewhat smaller dwelling size with a fewer number of bathrooms, suggesting adjustments for these differences would be necessary. Nevertheless, the parties' six comparables sold from February 2021 to June 2022 for prices ranging from \$206,000 to \$454,000 or from \$170.88 to \$339.82 per square foot of living area, including land. The subject's assessment reflects a market value of \$356,470 or \$265.23 per square foot of living area, including land, which falls within the range established by the comparables in the record. After considering adjustments to the comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Therefore, based on this record, the Board finds a reduction in the subject's assessment is not warranted based on overvaluation.

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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Member	Member
Dan De Kinin	Sarah Bobber
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:	September 16, 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**

Jack Mozdzierz, 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