FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Christopher S. Kim
DOCKET NO.: 22-36353.001-R-1
PARCEL NO.: 17-17-412-037-0000

The parties of record before the Property Tax Appeal Board are Christopher S. Kim, 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:	$11,358
IMPR.:	$35,424
TOTAL:	$46,782

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 2-story, multi-family building of frame and masonry exterior construction with 1,711 square feet of gross building area. The building is approximately 143 years old. Features include a full basement, central air conditioning, and a 2-car garage. The property has a 2,524 square foot site and is located in Chicago, West Chicago 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, including copies of warranty deeds, on four comparable sales located in the same assessment neighborhood as the subject. Each comparable is reported to be located over one mile from the subject. The comparables have sites ranging in size from 1,615 to 2,575 square feet of land area. The properties are improved with class 2-11 buildings of frame, masonry, or frame and masonry exterior construction ranging in size from 1,672 to 2,972 square feet of gross building area. The buildings range in age from 134 to 144 years old. Each comparable has a full basement. One comparable has a 2-car garage. The comparable properties sold from October 2020 to August 2022 for prices ranging from $309,909 to $500,000 or from $104.28 to $224.90 per square foot of gross building area, land included. Based on this evidence, the appellant requested that the subject's total assessment be reduced to $30,064 which would reflect a total market value of $300,640 or $175.71 per square foot of gross building area, land included, when applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

The appellant's submission included a copy of the "Cook County Board of Review" final decision dated June 15, 2023 which disclosed the subject has a total assessment of $46,782. The total assessment reflects a land assessment of $11,358 and an improvement assessment of $35,424, per the appellant's petition. The subject's total assessment reflects a market value of $467,820 or $273.42 per square foot of gross building area, land included, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal." In support of its contention of the correct assessment, the board of review submitted information on four comparables with the same assessment neighborhood code as the subject. The comparables have sites ranging in size from 1,875 to 2,500 square feet of land area. The properties are improved with 2-story, class 2-11 buildings of masonry exterior construction ranging in size from 1,514 to 1,644 square feet of gross building area. The buildings range in age from 133 to 178 years old. The comparables each have a full basement, two of which are finished with a recreation room. Three comparables each have central air conditioning and a 2-car garage. The comparable properties sold from July 2021 to November 2022 for prices ranging from $574,000 to $758,500 or from $355.84 to $499.01 per square foot of gross building area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 eight comparable sales for the Board's consideration. The Board finds the best evidence of market value to be the sales for the board of review comparables. These comparables sold proximate in time to the subject's January 1, 2022 assessment date at issue and are relatively similar to the subject in location, design/class, age, and dwelling size with varying degrees of similarity in other features. These comparables sold for prices ranging from $574,000 to $758,500 or from $355.84 to $499.01 per square foot of gross building area, land included. The subject's assessment reflects a market value of $467,820 or $273.42 per square foot of gross building area, land included, which falls below the best comparable sales in this record. The

Board gives less weight to the appellant's comparables which are located over one mile from the subject, less proximate in location than other comparables in this record and/or due to differences in gross building size when compared to the subject. Based on the market value evidence in this record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment based on overvaluation 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:

C E R T I F I C A T I O N

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: May 20, 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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