



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

APPELLANT: Cullerton St. Properties LLC
DOCKET NO.: 22-36389.001-R-1
PARCEL NO.: 17-19-414-037-0000

The parties of record before the Property Tax Appeal Board are Cullerton St. Properties LLC, 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: \$9,375
IMPR.: \$70,251
TOTAL: \$79,626

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 two improvements.¹ Improvement #1 is a 3-story multi-family building of masonry exterior construction with 4,158 square feet of building area. The building is approximately 141 years old. Features include an unfinished basement. Improvement #2 was described by the board of review as a class 2-03 dwelling with 1,122 square feet of living area but did not provide any additional property characteristics. The parcel has a 3,125 square foot site and is located in Chicago, West Chicago Township, Cook County. Improvement #1 is

¹ The board of review's evidence disclosed that the subject property has two improvements situated on one parcel of land, a fact omitted by the appellant and unrefuted by the appellant. The board of review provided only the classification code for Improvement #2. The Board finds the class 2-03 dwelling has living area of 1,122 square feet as the board of review disclosed the square footage of both improvements was 5,280 square feet (5,280 – 4,158 = 1,122).

classified as class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation with respect to only Improvement #1, as the basis of the appeal.

In support of this argument, the appellant submitted information, including copies of warranty deeds and real estate transfer tax data, on four comparable sales located in the same assessment neighborhood code as the subject. The comparables have sites that range in size from 2,150 to 3,175 square feet of land area. The parcels are improved with class 2-11 buildings of frame or masonry exterior construction ranging in size from 3,156 to 3,963 square feet of building area. The buildings range in age from 126 to 134 years old. Three comparables each have a full basement and one comparable has a slab foundation. One comparable has a 2-car garage. The comparable properties sold from February to August 2021 for prices ranging from \$383,000 to \$572,500 or from \$110.22 to \$145.30 per square foot of building area, land included.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$49,778, for both improvements, which reflects a market value of \$497,780, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance and a reduced total improvement assessment of \$40,403 for both improvements. The appellant did not provide an allocation of the requested total assessment attributable to each of the individual improvements.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for this property of \$79,626, which includes both improvements. The subject's assessment reflects a total market value of \$796,260, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The subject has a total improvement assessment for both improvements of \$70,251. The board of review indicated in the notes, that the subject had an improvement assessment of \$37,251. When also considering the land assessment, the total assessment for Improvement #1 would be \$46,626, which reflects a market value of \$466,260, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in the same assessment neighborhood code as the subject. The equity data supplied is not responsive to the subject's overvaluation argument and will not be considered in this appeal. 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 appellant submitted four comparable sales for the Board's consideration. The Board finds the best evidence of market value to be the sales for the appellant's comparables #1, #3, and #4. These comparables sold proximate in time to the subject's January 1, 2022 assessment date at issue and are similar to the subject in location, class, and dwelling size with varying degrees of similarity in lot size, design, foundation type, and other features suggesting appropriate adjustments would be necessary for these differences to make them more equivalent to the subject. The three comparables sold for prices ranging from \$410,000 to \$572,500 or from \$110.22 to \$145.30 per square foot of gross building area, land included. The subject's assessment, for land and Improvement #1 only, reflects a market value of \$466,260 which falls within the overall market value range established by the best comparable sales in this record. The Board gives less weight to the appellant's comparable #2 which is substantially smaller home than the subject. Based on the market value evidence in this record and after considering adjustments to the three 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: _____

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: _____

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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