

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Rosa Eng

DOCKET NO.: 22-43966.001-R-1 PARCEL NO.: 13-17-310-040-0000

The parties of record before the Property Tax Appeal Board are Rosa Eng, 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: \$9,912 **IMPR.:** \$16,446 **TOTAL:** \$26,358

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 1.5-story dwelling of frame exterior construction with 1,668 square feet of living area. The dwelling is 108 years old and features a full basement and central air conditioning. The property has a 3,540 square foot site and is located in Chicago, Jefferson 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 comparable sales located within the subject's assessment neighborhood. The comparables consist of 1-story class 2-03 dwellings of wood exterior construction ranging in size from 1,210 to 1,660 square feet of living area. The homes range in age from 98 to 119 years old. Each dwelling has central air conditioning. Three comparables each have a basement, one of which has finished area, and one comparable has a

concrete slab foundation. Three comparables each have either a 1-car, 1.5-car, or 2-car garage. The parcels range in size from 3,000 to 4,062 square feet of land area. The comparables sold from October 2020 to December 2022 for prices ranging from \$145,000 to \$217,700 or from \$115.08 to \$132.23 per square foot of living area, including land. Based on this evidence, the appellant requested a reduced assessment of \$20,895, for an estimated market value of \$208,950 or \$125.27 per square foot of living area, including land, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$26,358. The subject's assessment reflects a market value of \$263,580 or \$158.02 per square foot of living area, land included, when applying the 10% level of assessment for class 2 property 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 comparable sales located in the subject's assessment neighborhood. The comparables consist of 1-story or 1.5-story class 2-03 dwellings of masonry exterior construction ranging in size from 1,376 to 1,580 square feet of living area. The dwellings range in age from 46 to 70 years old. Three dwellings each have a basement, two of which have finished area, and one comparable has a concrete slab foundation. Two comparables have central air conditioning and three comparables each have a 1.5-car, 2-car, or 2.5-car garage. The parcels range in size from 4,000 to 8,160 square feet of land area. The comparables sold from February 2019 to February 2021 for prices ranging from \$260,000 to \$410,000 or from \$181.69 to \$288.73 per square foot of living area, including land. 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 this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight comparable sales to support their respective positions before the Property Tax Appeal Board. The Board finds the parties' comparables are not truly similar to the subject due to differences in age, dwelling size, and features. Nevertheless, the Board gives reduced weight to appellant comparable #2 and board of review comparable #1, which sold less proximate to the January 1, 2022 assessment date at issue in this appeal.

The Board finds the best evidence of market value to be the appellant's comparable sales #1, #3, and #4, along with board of review comparables #2, #3, and #4, which sold proximate to the assessment date at issue and have varying degrees of similarity to the subject. These comparables sold from January 2021 to December 2022 for prices ranging from \$145,000 to \$410,000 or from \$115.08 to \$288.73 per square foot of living area, including land. The

subject's assessment reflects a market value of \$263,580 or \$158.02 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to 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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| 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.

| August 19, 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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