

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Endy Zemenides
DOCKET NO.: 22-43975.001-R-1
PARCEL NO.: 13-03-303-033-0000

The parties of record before the Property Tax Appeal Board are Endy Zemenides, 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: \$12,400 **IMPR.:** \$49,464 **TOTAL:** \$61,864

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 dwelling of masonry exterior construction with 2,014 square feet of living area. The dwelling is approximately 84 years old. Features of the home include a full basement with finished area, central air conditioning, two fireplaces and a 1-car garage. The property has a 4,960 square foot site and is 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 four comparables with the same assessment neighborhood code as the subject. The comparables are class 2-05 properties with sites ranging in size from 4,860 to 7,620 square feet of land area and are improved with 2-story dwellings of masonry or masonry and wood exterior construction ranging in size from 1,012 to 2,064 square feet of living

area. The comparables are 70 to 78 years old and have full unfinished basements. Each comparable has central air conditioning, two fireplaces and a 1-car garage. The comparables sold from February 2020 to July 2021 for prices ranging from \$405,000 to \$539,900 or from \$211.05 to \$418.97 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$61,864. The subject's assessment reflects a market value of \$618,640 or \$307.17 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 four comparable sales with the same assessment neighborhood code as the subject. The comparables are class 2-05 properties that have sites ranging in size from 4,092 to 7,920 square feet of land area and are improved with 2-story dwellings of masonry or frame and masonry exterior construction that range in size from 1,634 to 2,073 square feet of living area. The dwellings are 79 to 96 years old and have full basements, one of which has finished area. Each comparable has central air conditioning. Three comparables each have one fireplace. Three comparables each have a 1.5-car to a 2.5-car garage. The comparables sold from June 2019 to March 2022 for prices ranging from \$735,000 to \$790,000 or from \$354.56 to \$459.00 per square foot of living area, including land. Based on this evidence the board of review requests 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 eight comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2 and #4 and board of review comparable #1 due to differences in age and/or dwelling size when compared to the subject. The Board gives less weight to board of review comparable #1 which sold in 2019, less proximate in time to the January 1, 2021 assessment date than the other comparable sales in the record. The Board gives less weight to board of review comparables #3 and #4 due to differences in dwelling size or foundation type when compared to the subject.

The Board finds the best evidence of market value to be appellant's comparable #3 and board of review comparable #2 which sold proximate in time to the assessment date at issue and overall they were most similar to the subject in age, dwelling size and features. These comparables sold in May 2020 and May 2021 for prices of \$510,000 and \$735,000 or \$257.71 and \$354.56 per square foot of living area, including land. The subject's assessment reflects a market value of \$618,640 or \$307.17 per square foot of living area, including land, which is bracketed 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 the appellant did not prove by a preponderance of the evidence that a reduction in the subject's assessment is 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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	Chairman
C. R.	Robert Stoffen
Member	Member
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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:	February 18, 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

Endy Zemenides, 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