

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Angelo Gregory
DOCKET NO.: 22-51992.001-R-1
PARCEL NO.: 10-34-124-055-0000

The parties of record before the Property Tax Appeal Board are Angelo Gregory, 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>A Reduction</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: \$13,416 **IMPR.:** \$22,644 **TOTAL:** \$36,060

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 multi-level dwelling of masonry exterior construction with 1,454 square feet of living area. The dwelling is approximately 68 years old. Features of the home include a partial basement/lower level with finished area, central air conditioning, a fireplace, and a two-car garage. The assessing officials report the subject also has "other improvements" which are not further identified on the record. The property has a 9,583 square foot site and is located in Lincolnwood, Niles Township, Cook County. The subject is classified as a class 2-34 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 suggested comparable sales located in the same neighborhood code as the subject. The parcels range in size from 4,680 to 7,920 square feet of

land area and are each improved with a class 2-34 multi-level dwelling of masonry exterior construction. The dwellings are 60 to 67 years old and range in size from 1,419 to 1,593 square feet of living area. Each dwelling has a partial basement/lower level with finished area. Features include central air conditioning, one or two fireplaces, and two dwellings each have a one-car garage. The comparables sold from June 2021 to December 2022 for prices ranging from \$241,000 to \$410,000 or from \$169.84 to \$278.16 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced total assessment of \$34,208 which would reflect a market value of \$342,080 or \$235.27 per square foot of living area, including land, when applying the level of assessment for class 2-34 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the final decision disclosing the total assessment for the subject of \$43,310. The subject's assessment reflects a market value of \$433,010 or \$297.87 per square foot of living area, including land, when applying the level of assessment for class 2-34 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 properties, three of which (comparables #1, #3 and #4) provide sales data.¹ The comparables are located in the same neighborhood code as the subject one is in the subarea and one is ½ of mile from the subject. The parcels range in size from 3,720 to 5,940 square feet of land area and are each improved with a class 2-34 multi-level dwelling of masonry or frame and masonry exterior construction. The dwellings range in age from 64 to 68 years old and range in size from 964 to 1,168 square feet of living area. Each dwelling has a partial basement/lower level with finished area. Two comparables have central air conditioning, and two comparables have 1-car and 2.5-car garages, respectively. The comparables sold from January 2019 to October 2021 for prices ranging from \$258,000 to \$435,000 or from \$267.63 to \$372.43 per square foot of living area, including land. Based on the foregoing 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of seven suggested comparable sales, board of review comparable #2 had no sales data, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1 and #4 due to the lack of a garage amenity which is a feature of the subject. The Board has given reduced weight to board

¹ Without market value information, comparable #2 will not be analyzed in this decision nor considered by the Board.

of review comparables #1, #3 and #4, each of which differ substantially in dwelling size from more than 19% to more than 33% when compared to the subject and as compared to other comparable sales in the record that are more similar to the subject.

The Board finds the best evidence of market value to be appellant's comparable sales #2 and #3, which are similar to the subject in classification, design, foundation type, air conditioning amenity, and some features. These homes necessitate adjustments for their ages of 62 and 65 whereas the subject is older at 68 years old. These dwellings also are similar the subject in dwelling size at 1,455 and 1,593 square feet of living area necessitating adjustments to make the dwellings more similar to the subject 1,454 square foot dwelling. Adjustments to these comparables are necessary for variations in lot size each of which are smaller than the subject, fireplace count, and inferior garage capacity. The comparables sold in October 2021 for prices of \$350,000 and \$410,000 or for \$240.56 and \$257.38 per square foot of living area, including land. The subject's assessment reflects a market value of \$433,010 or \$297.87 per square foot of living area, including land, which is above the best comparable sales in this record both in terms of overall market value and on a per-square-foot of living area, including land. While the Board finds this higher valuation may be supported by the "other improvements" of the subject that were not disclosed herein, based on the existing record evidence and after considering necessary adjustments to the comparables for differences when compared to the subject, the Board finds the appellant established overvaluation by a preponderance of the evidence and 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. L. R.	Robert Stoffen
Member	Member
Dan De Kinin	Sarah Bokley
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.

October 21, 2025
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Child Park Table 1

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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