FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: One Earth LLC
DOCKET NO.: 22-55537.001-R-1
PARCEL NO.: 14-32-425-048-0000

The parties of record before the Property Tax Appeal Board are One Earth LLC, the appellant(s), 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:	$15,625
IMPR.:	$78,375
TOTAL:	$94,000

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 1,250 square foot site. It is improved with a 10-year-old, three-story, single-family dwelling of frame and masonry construction, containing 1,958 square feet of living area. The subject property is located in Chicago, North Chicago Township, Cook County and is classified as a class 2-07 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of its market value argument, the appellant completed Section IV – Recent Sale Data in its Residential Appeal Form indicating the subject property was purchased on September 30, 2019, for $600,000, the sale did not occur between family members, was sold by a realtor, and was advertised for sale with the multiple listing service. Also, the appellant submitted copies of the Settlement Statement, Warranty Deed, MLS printout, and Real Estate Sales Contract. The MLS sheet describes the subject property as "spectacular." The Settlement Statement lists payments made to both the buyer's and the seller's real estate brokerages and seller's attorney's fees. The Real Estate Sales Contract lists a purchase price of $2,570,000. The Real Estate Sale's Contract's Exhibit A indicates there was an auction house involved in the sale and Exhibit B indicates there were twelve separate properties involved in the sale. The appellant also submitted a copy of the board of review's written decision reflecting its final total assessment for the subject property of $94,000. Based on this evidence, the appellant requested a reduction in the subject's assessment to $60,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total valuation assessment for the subject property of $94,000 and an improvement assessment of $78,375. The valuation assessment reflects a market value of $940,000, or $459.65 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four suggested comparables. Each comparable was improved with either a two-story or a three-story, single-family residence of either masonry, frame, or frame and masonry construction. The comparables ranged from 1,734 to 1,868 square feet of living area and from 7 to 33 years of age. The board of review's comparables sold between January of 2020 and August of 2022 for prices ranging from $850,000 to $1,412,500, or from $490.20 to $759.00 per square foot of living area. In addition, the board of review included information in its grid analysis indicating the subject property sold in October of 2019 for $600,000, or $306.44 per square foot of living area.

This matter was set to proceed to hearing. Prior to hearing, the parties submitted a written request to waive hearing and for this matter to be written on the evidence previously submitted. The administrative law judge granted the parties' request.

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 Board finds the best evidence of market value to be *the board of review's comparable sales #1, #2, #3, and #4.* These comparables sold between January of 2020 and August of 2022 for prices ranging from $490.20 to $759.00 per square foot of living area. They were most similar to the subject property in location and living area square footage and location. The Board finds the evidence of the sale of the subject property is insufficient to prove market value by a preponderance of the evidence. In particular, the Real Estate Sales Contract lists a purchase price of $2,570,000 and the Real Estate Sale's Contract's Exhibit A indicates there was an auction house involved in the sale. Exhibit B lists twelve separate properties involved in the sale, indicating the purchase price is from a bulk sale and calls into question whether the sale price of the subject property is allocated at market value. Also, the MLS sheet describes the subject property as “spectacular,” which would align with a market value similar to the board of review’s comparable properties #1, #2, #3, and #4 that are located either on the same block or within a quarter of a mile from the subject property.

The subject's assessment reflects a market value of $459.65 per square foot of living area, including land, which is below the range established by the best comparable sales in this record. Based on this evidence the Board finds a reduction in the subject's assessment on the basis of 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: September 15, 2026

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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