



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

APPELLANT: John Valavanis
DOCKET NO.: 23-21029.001-R-1
PARCEL NO.: 06-33-303-003-0000

The parties of record before the Property Tax Appeal Board are John Valavanis, the appellant(s); 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: \$25,000
IMPR.: \$25,000
TOTAL: \$50,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

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 2023 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 42,436 square foot parcel of land improved with a 24-year-old, two-story, frame, single-family dwelling, containing 3,685 square feet of living area. Features of the home include 3.1 bathrooms and a 3-car garage. The property is located in Elgin, Hanover Township, Cook County and is a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant contends overvaluation and assessment inequity as the bases of the appeal. In support of its overvaluation argument, appellant submitted sales information on three comparable properties that sold between June of 1993 and April of 2021 for prices ranging between \$88.63 to \$200.87 per square foot of living area, including land. Each of the comparable sales were improved with a two-story dwelling of either frame or frame and masonry construction. They ranged from 1,200 to 2,500 square feet of living area, from 32 to 41 years of age, contained from

2 bathrooms to 4.1 bathrooms, and were located either next door to or across the street from the subject property. The petition discloses the subject is an owner-occupied residence.

In support of its assessment inequity argument, appellant submitted information on the same three suggested comparables. They ranged in improvement assessment between \$4.98 and \$10.12 per square feet of living area. Appellant also included a copy of the board of review's December 7, 2023, written decision reflecting a final assessment for the subject property of \$50,000. Based on this evidence, appellant requested a reduction in the subject's assessment to \$40,000.

The board of review submitted its "Board of Review Notes on Appeal" depicting a total assessed valuation of \$50,000, with an improvement assessment of \$25,000, or \$6.78 per square feet of living area. The subject's assessment reflects a market value of \$500,000, or \$135.69 per square foot of living area when applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted four comparable properties. The comparable properties were two-story, single-family dwellings of frame construction and ranged in size between 3,086 and 3,328 square feet of living area and in assessment between \$12.33 and \$15.65 per square foot of living area. They ranged in age between 2 and 7 years old and each had a 3-car garage and 2.1 bathrooms. Three of the board of review's comparables sold in between February of 2020 and May of 2021 for prices ranging from \$142.02 and \$163.88 per square foot of living area, including land.

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 *appellant's sales comparable #3 and the board of review's sales comparables #1 and #3*. These properties sold in 2021 for prices ranging between \$142.02 to \$200.87 per square foot of living area, including land. Greater weight was given to the sales comparables with sales dates closest to the tax year at issue in the instant appeal. The subject's current assessment of \$135.69 per square foot of living area, including land, reflects a market value below the market value established by the best comparables in this record. Based on this record, the Board finds appellant *has not* proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment *is not* warranted.

The taxpayer also contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments

for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds 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 assessment equity to be *appellant's comparable #1 and the board of review's comparables #2, #3, and #4*. These comparables were most similar to the subject property in living area square footage and/or closest to it in proximity. Lesser weight was given to the comparables with the greatest differences in living area square footage in comparison to the subject property. The best comparables had improvement assessments that ranged from \$7.57 to \$13.51 per square foot of living area. The subject's improvement assessment of \$6.78 per square foot of living area falls below the range established by the best comparables in this record. Based on this record, the Board finds appellant *did not* demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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.



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: _____

January 21, 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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