



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

APPELLANT: 320 Lake Shore LLC
DOCKET NO.: 23-26860.001-R-1
PARCEL NO.: 16-19-417-036-0000

The parties of record before the Property Tax Appeal Board are 320 Lake Shore LLC, the appellant, by George N. Reveliotis, attorney-at-law 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: \$6,993
IMPR.: \$33,007
TOTAL: \$40,000

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 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 is improved with a two-story multi-family building of masonry exterior construction containing 4,689 square feet of building area. The building is approximately 81 years old. Features of the property include a full basement with an apartment, central air conditioning, one fireplace, five bathrooms and a 3-car garage. The property has a 4,662 square foot site located in Berwyn, Berwyn Township, Cook County. The subject is classified as a class 2-11 apartment building under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on six equity comparables consisting of class 2-11 properties improved with two-story multi-family buildings of masonry exterior construction that range in size from 4,116 to 5,046 square feet of building

area. The comparables are 78 to 99 years old. Each property has a full basement finished with an apartment, one fireplace, and a 2-car, 2.5-car or 3-car garage.¹ The comparables have three or five full bathrooms, and two comparables have an additional one or two half bathrooms. These properties have the same neighborhood code as the subject and are located within .11 of a mile of the subject. The comparables have improvement assessments ranging from \$25,602 to \$31,790 or from \$5.96 to \$6.36 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$29,212.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$40,000. The subject property has an improvement assessment of \$33,007 or \$7.04 per square foot of building area. In support of its contention of the correct assessment the board of review submitted information on three equity comparables composed of class 2-11 properties improved with two-story multi-family buildings of masonry exterior construction that range in size from 4,576 to 4,868 square feet of building area. The buildings are 65 to 98 years old. Each comparable has a full basement with an apartment, and five or six bathrooms. Two comparables have either a 2.5-car or a 3.5-car garage. These comparables have the same neighborhood code as the subject and are located in the same block or ¼ of a mile from the subject property. Comparable #1 is located along the same street as the subject property. The comparables have improvement assessments ranging from \$31,208 to \$35,499 of from \$6.82 to \$7.29 per square foot of building area.

Conclusion of Law

The appellant 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 the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on nine equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. Appellant's comparables #2 through #6 are from 11 to 18 years older than the subject building and each has a smaller garage than the subject that would require upward adjustments to make these properties more equivalent to the subject for these differences. Additionally, appellant's comparables #3 through #6 have fewer bathrooms than the subject requiring upward adjustments for this difference from the subject. Conversely, appellant's comparable #2 has an additional ½ bathroom the subject does not have indicating a downward adjustment for this difference would be appropriate. These five comparables have improvement assessments ranging from \$25,602 to \$31,790 or from \$5.96 to \$6.30 per square foot of building area. The subject's improvement assessment of \$33,007 or \$7.04 per square foot of building area is above this range but is

¹ The appellant submitted copies of the Cook County Assessor's Office property characteristic sheets for the subject property and the comparables disclosing each property has a basement finished with an apartment and one fireplace.

appropriate given the necessary adjustments to these comparables for differences in age, bathroom count and garage size.

Board of review comparable #2 is 16 years younger than the subject and has a larger garage than the subject indicating downward adjustments to this comparable for differences from the subject would be proper. Conversely, board of review comparable #2 has no fireplace, unlike the subject indicating an upward adjustment would be appropriate. Board of review comparable #3 is 17 years older than the subject, has no fireplace and no garage suggesting upward adjustments to this comparable would be property to make it more equivalent to the subject for these differences. Conversely, board of review comparable #3 has one more bathroom than the subject necessitating a downward adjustment. Board of review comparable #2 and #3 have improvement assessments of \$31,208 and \$35,499 or \$6.82 and \$7.29 per square foot of building area, respectively. The subject's improvement assessment of \$33,007 or \$7.04 per square foot of building area is bracketed by these two properties and is appropriate after considering the suggested adjustments to these two properties.

Appellant's comparables #1 and board of review comparable #1 are most similar to the subject in age. Board of review comparable #1 has no fireplace and a smaller garage than the subject necessitating upward adjustments to make this property more equivalent to the subject property. These comparables have improvement assessments of \$30,846 and \$32,763 or \$6.36 and \$7.07 per square foot of building area, respectively. The subject's improvement assessment of \$33,007 or \$7.04 per square foot of building area is above the total improvement assessments of the two comparables most like the subject in age but bracketed by these comparables on a per square foot of building area basis, which appears appropriate given the suggested adjustments.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. *Apex Motor Fuel Co. v. Barrett*, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not all assessed at identical levels, all that the constitution requires is a practical uniformity which exists based on the evidence in this record.

Based on this record the Board finds the 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:

May 19, 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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