



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

APPELLANT: Goran Mamic
DOCKET NO.: 23-49070.001-R-1
PARCEL NO.: 14-32-101-009-0000

The parties of record before the Property Tax Appeal Board are Goran Mamic, 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 **A Reduction** 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: \$41,250
IMPR.: \$99,105
TOTAL: \$140,355

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 consists of a two-story dwelling of masonry exterior construction containing 3,098 square feet of living area. The dwelling is approximately 122 years old. Features of the property include a full basement with a formal recreation room, central air conditioning, one fireplace and a 2-car garage.¹ The property has a 3,300 square foot site located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant marked on the petition that assessment equity was the basis of the appeal contending inequity regarding the improvement assessment. In support of this argument the

¹ The appellant submitted copies of two Multiple Listing Service (MLS) listings for the subject property describing the home as having a finished basement, central air conditioning, one fireplace, four full bathrooms and two half bathrooms.

appellant submitted information on nine equity comparables consisting of class 2-06 properties of frame, masonry or frame and masonry construction that range in size from 2,302 to 3,584 square feet of living area. The homes range in age from 131 to 145 years old. Eight comparables have full basements with five having finished area and one comparable has a slab foundation. Each comparable has one or two fireplaces, and a 2-car or 2.5-car garage. The comparables have from two to five full bathrooms and six comparables have an additional one or two half bathrooms. The comparables have the same assessment neighborhood code as the subject and are located from .04 to .17 of a mile from the subject property. Their improvement assessments range from \$45,875 to \$123,658 or from \$18.20 to \$38.80 per square foot of living area.

The appellant's counsel also submitted a written statement asserting that the assessment of the subject property is excessive due to: A) the assessment is greater than the fair cash and/or market value of the subject; and B) the assessment is not reflective of the true market value of the subject property. Counsel explained the subject property has been repeatedly listed for sale during 2023 for \$1,300,000. He further explained the subject was originally under contract for \$1,300,000 but the transaction fell through. Counsel further stated the price was lowered to \$1,200,000 to no avail. The appellant's submission also included a listing history for the subject identifying three separate MLS numbers, the listing date and price. According to the listing history the property was listed on July 17, 2023, for a price of \$1,300,000, went under contract but the contract fell through; the property was relisted on September 19, 2023, for a price of \$1,300,000 but the listing was cancelled; and the property was relisted on October 23, 2023, for a price of \$1,200,000. Counsel stated the property was sold during 2024 for a price of \$1,100,000, indicating little interest in the property. The appellant submitted a copy of the listing for the subject property dated October 23, 2023, for a price of \$1,200,000, which is the third listing of the subject property. The appellant also submitted a copy of an MLS listing dated February 1, 2024, disclosing a listing price of \$1,200,000 and a sales price of \$1,100,000, with a closing date of February 5, 2024. The appellant's counsel contends the subject's assessment reflecting a market value of \$1,650,470 is excessive considering the property had been on the market for a much lower amount but was unable to sell.

Based on this evidence the appellant requested the subject's assessment be set at 10% of \$1,324,860 or \$132,486.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$165,046. The subject property has an improvement assessment of \$123,796 or \$39.96 per square foot of living area. The subject's assessment reflects a market value of \$1,650,460 when applying the Cook County Real Property Assessment Classification Ordinance level of assessments for class 2-06 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables consisting of class 2-06 properties improved with two-story dwellings of masonry exterior construction that range in size from 2,951 to 3,262 square feet of living area. The dwellings range in age from 119 to 143 years old. Each property has a full basement with three having finished area, and a 2-car garage. Three comparables have central air conditioning and two comparables have one or two fireplaces. The comparables have two, three or four full bathrooms and two comparables have an additional half bathroom. These

properties have the same assessment neighborhood code as the subject property and are located ¼ of a mile from the subject or in the “subarea.” The comparables have improvement assessments that range from \$116,817 to \$155,500 or from \$36.32 to \$51.78 per square foot of living area.

Conclusion of Law

As an initial matter the appellant checked assessment equity as the basis of the appeal on the Residential Appeal petition filed with this Board. The appellant’s counsel, however, in a written narrative raised a market value issue based on the subject’s listing history in 2023 for an original price of \$1,300,000, a relisting price of \$1,200,000, and a subsequent February 2024 sale of the subject for \$1,100,000. Section 16-180 of the Property Tax Code (35 ILCS 200/16-180) states in part:

Each appeal shall be limited to the grounds listed in the petition filed with the Property Tax Appeal Board. . . .

Similarly, section 1910.50(a) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(a)) states in part:

Each appeal shall be limited to the grounds listed in the petition filed with the Board.

As the appellant did not mark on the petition that overvaluation based on a recent sale or listing of the subject property was also a basis of the appeal, the Board is precluded from considering this argument notwithstanding the fact the 2023 listing prices and the subsequent February 2024 sales price of \$1,100,000 as reflected in the sales contract are significantly below the market value reflected by the subject’s assessment of \$1,650,460.

As noted, the appellant marked assessment equity 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted information on thirteen equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant’s comparables #3, #4, #5, #6, #7 and #9 due to differences from the subject in dwelling size. The Board gives less weight to the board of review comparables due to differences from the subject in or location. The Board gives most weight to appellant’s comparables #1, #2 and #8 as these properties are most similar to the subject in location and dwelling size. The comparables have varying degrees of similarity to the subject in features that would require adjustments to make them more equivalent to the subject property. Each of the comparables have one more fireplace than the subject, requiring a downward

adjustment to make these comparables more equivalent to the subject for this difference. Conversely, the comparables have fewer bathrooms than the subject dwelling and appellant's comparable #8 has a crawl space foundation unlike the subject's full basement with finished area that would require upward adjustments to make the comparables more equivalent to the subject for these differences. These three comparables have improvement assessments that range from \$73,000 to \$117,836 or from \$26.00 to \$38.80 per square foot of living area. The subject's improvement assessment of \$123,796 or \$39.96 per square foot of living area falls above the range established by the best comparables in this record. Based on this record, after considering the appropriate adjustments to the best comparables to make them more equivalent to the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed 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.



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 20, 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

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