FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Dimas Silveyra
DOCKET NO.: 24-53645.001-R-1
PARCEL NO.: 13-11-210-022-0000

The parties of record before the Property Tax Appeal Board are Dimas Silveyra, 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 ***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:	$13,020
IMPR.:	$33,344
TOTAL:	$46,364

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 2024 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 multi-family building of masonry exterior construction with 2,742 square feet of gross building area. The building is approximately 100 years old. Features of the building include a full basement, two bathrooms and a 2-car garage.[1] The property has a site with 3,720 square feet of land area and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 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 comparables that have the same assessment neighborhood code as the subject and are located within .25 of a mile from the subject property.

[1] The parties differ as to whether or not the subject building has a fireplace. The appellant reported the subject has one fireplace, while the board of review reported the subject has no fireplace.

The comparables have sites that contain 3,720 or 4,650 square feet of land area. The comparables are class 2-11 properties that are improved with two-story multi-family buildings of frame or masonry exterior construction ranging in size from 2,260 to 3,122 square feet of gross building area. The buildings range in age from 98 to 102 years old. One comparable has a concrete slab foundation and three comparables each have a full basement. Each comparable has two or three bathrooms, one or two fireplaces and either a 1-car, a 1.5-car, or a 2-car garage. The properties sold from February 2023 to October 2024 for prices ranging from $355,000 to $565,000 or from $157.08 to $180.97 per square foot of gross building area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to $46,364, reflecting a market value of $463,640 or $169.09 per square foot of gross building area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $51,000. The subject's assessment reflects a market value of $510,000 or $186.00 per square foot of gross building area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same assessment neighborhood code as the subject and are located within the same block and along the same street as the subject or approximately ¼ of a mile from the subject property. The comparables have sites that contain 3,720 or 4,650 square feet of land area. The comparables are class 2-11 properties that are improved with two-story multi-family buildings of masonry exterior construction ranging in size from 2,317 to 2,688 square feet of gross building area. The buildings range in age from 68 to 111 years old. The comparables each have a full basement, one with finished area. Each comparable has two full bathrooms and either a 1-car or a 2-car garage. One comparable has an additional half bathroom. The properties sold from May 2022 to December 2024 for prices ranging from $540,000 to $709,000 or from $208.82 to $263.76 per square foot of gross building area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted eight comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables #1 and #4 due to differences from the subject in dwelling size and/or foundation. The Board has given reduced weight to board of review comparables #1, #3 and #4 due to their sale dates occurring in 2022, less proximate to the lien date at issue than other sales in the record or they have a considerably smaller dwelling size and newer age, when compared to the subject. The Board has also given reduced weight to board of review comparable #2 which appears to be an outlier due to its significantly higher sale price of $709,000 or $263.76 per square foot of living area, including land compared to the other sales in the record.

The Board finds the best evidence of market value to be the appellant’s comparables #1 and #4, which sold more proximate in time to the January 1, 2024 assessment date and are similar to the subject in location, site size, building size, design, age and some features. These two comparables sold in February and June 2023 for prices of $455,000 and $465,000 or for $165.33 and $172.99 per square foot of gross building area, land included. The subject's assessment reflects a market value of $510,000 or $186.00 per square foot of gross building area, including land, which falls above the two best comparable sales in this record. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject’s estimated market value reflected by its assessment is excessive. Therefore, based on this record, the Board finds a reduction in the subject's assessment commensurate with the appellant’s request is warranted.

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: July 21, 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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