



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

APPELLANT: Dennis Giannis
DOCKET NO.: 16-41487.001-R-1 through 16-41487.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Dennis Giannis, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
16-41487.001-R-1	10-28-100-014-0000	1,957	8,926	\$10,883
16-41487.002-R-1	10-28-100-015-0000	1,957	8,926	\$10,883

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 2016 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 two land parcels improved with a 62-year old, one-story, single-family dwelling of masonry construction. The improvement contains 1,194 square feet of living area, a full basement and a two and one-half car garage. The property is sited on 5,400 square feet of land and is located in Niles Township, Cook County. The subject is classified as a class 2-03, residential property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's petition contends assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables. They are improved with a one-story, single-family dwelling with masonry or frame and masonry exterior

construction. The improvements ranged in size from 1,195 to 1,404 square feet of living area and in assessments from \$14.39 to \$15.49 per square feet of living area. Each property had basement and garage area.

The appellant's pleadings indicate the subject's correct total assessment of \$23,596, but the subject's square footage size instead of an improvement assessment is indicated on the grid analysis. In support of this total assessment, the appellant submitted a copy of the subject's decision from the board of review as well as the subject's printout from the county assessor's website. This data appears to indicate that the subject's improvement is prorated in a 50%/50% proration over the two land parcels.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment of only one land parcel for the subject of \$11,798. The subject property has an improvement assessment of \$9,841 or \$8.24 per square foot of living area for only 50% of the subject property.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables, located within a two-block radius of the subject. They are improved with a one-story, single-family dwelling of masonry or frame and masonry exterior construction. The improvements ranged: in age from 55 to 66 years; in size from 1,000 to 1,048 square feet of living area; and in assessment of \$17.69 to \$19.15 per square foot. Each property included a full basement and one and one-half car garage.

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.

Initially, the Board finds based upon the evidence that the subject's total improvement assessment is \$19,682 or \$16.48 per square foot of living area.

Next, the Board finds the best evidence of assessment equity to be *the appellant's comparables #1 through #3*. These comparables had improvement assessments that ranged from \$14.39 to \$15.49 per square foot of living area. The subject's improvement assessment of \$16.48 per square foot of living area is above the range established by the best comparables in this record. The Board accorded diminished weight to the remaining properties due to a disparity in location, style, age and/or size. Based on this record, the Board finds the appellant did demonstrate 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: September 15, 2020



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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