



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

APPELLANT: Peter Buhelos  
DOCKET NO.: 17-02609.001-R-1  
PARCEL NO.: 16-10-301-012

The parties of record before the Property Tax Appeal Board are Peter Buhelos, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; and the Lake 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 **Lake** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$92,687  
**IMPR.:** \$115,324  
**TOTAL:** \$208,011

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Lake County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2017 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 one-story masonry and frame dwelling containing 3,138 square feet of living area that was built in 1960. Features of the home include a 1,139-square foot basement with 911-square feet of finished area, central air conditioning, a fireplace, and an attached 2-car garage. The subject also has a screen porch. The dwelling is situated on a 23,229-square foot lot and is located in Highland Park, Moraine Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal estimating the subject property had a market value of \$535,000 as of January 1, 2017. The appraisal was prepared by William P. Neberieza, SRA, a Certified Residential Real Estate Appraiser. The intended use of the appraisal was property tax appeal.

The appraiser described the subject property as having “average” functional utility, quality of construction, and condition.

The appraiser developed the sales comparison approach to value using three comparable sales located from 3.12 to 3.87 miles from the subject property. The properties are improved with one-story dwellings that range in size from 2,469 to 2,872 square feet of living area, and range in age from 40 to 102 years old with comparable #2 having an effective age of 25. The comparables have sites ranging in size from 16,093 to 26,455 square feet of land area. Each comparable has a basement with finished area, central air conditioning, one to three fireplaces and a 2-car garage. The sales of the comparables occurred from January 2015 to October 2016 for prices ranging from \$516,535 to \$550,000 or from \$184.61 to \$212.64 per square foot of living area, including land. After making adjustments to the comparables for differences from the subject, the appraiser arrived at adjusted prices of the comparables ranging from \$519,500 to \$539,300 and arrived at an estimated value of the subject of \$535,000 or \$170.49 per square foot of living area, land included.

Based on this evidence, the appellant requested the subject’s total assessment be reduced to \$178,316 to reflect the appraised value at a statutory assessment level of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$208,011. The subject's assessment reflects an estimated market value of \$627,484 or \$199.96 per square foot of living area when using the 2017 three-year average median level of assessment for Lake County of 33.15% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on six comparable sales located from .034 of a mile to 1.018 miles from the subject property. The comparables are improved with one story or two-story dwellings of brick or wood-siding exterior construction that were built from 1956 to 1984 and range in size from 2,231 to 3,188 square feet of living area. Each comparable has a basement with five having finished areas. Each dwelling also has central air conditioning, one or two fireplaces, and a garage ranging in size from 476 to 576 square feet of building area. The properties have sites ranging in size from 10,037 to 24,071 square feet of land area. The sales occurred from January 2016 to April 2017 for prices ranging from \$550,000 to \$790,000 or from \$204.81 to \$247.80 per square foot of living area, including land.

The board of review also submitted a narrative arguing that the appraiser’s sales are each located in excess of three miles from the subject property and in different market areas from the subject. The board of review also contended that two sales were sold in 2015 or approximately 34 and 35 months removed in time from the subject’s assessment date. The board of review submission also included property record cards for the subject property as well as the parties’ comparable sales, an aerial map of the subject property in relation to the board of review comparables, and a Multiple Listing Service (MLS) sheet associated with appraiser’s sale #2 denoted a sold “as is.”

Based on this evidence and argument, the board of review requested that no change be made to the subject’s assessment.

### **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 appellant submitted an appraisal report and the board of review submitted six comparable sales in support of their respective positions before the Property Tax Appeal Board.

The Board gave less weight to the conclusion of value contained in the appraisal report as well as the three sales used by the appraiser due to each of the sales being located more than three miles distant from the subject property when other sales more proximate in distance to the subject were available. Furthermore, the appraiser utilized two sales in January and February 2015 which are 34 and 35 months distant in time from the subject's January 1, 2017 assessment date and less likely to be reflective of the subject's market value as of that date. These factors undermine the credibility of the appraisal's final value conclusion.

The Board gave less weight to board of review comparable sales #5 and #6 based on their two-story dwelling style, which is dissimilar to the subject's one-story ranch design. The Board also gave less weight to board of review comparable sale #3 based on its unfinished basement area, unlike the subject's basement with 911 square feet of finished area.

The Board finds the best evidence of market value to be the comparable sales #1, #2, and #4 provided by the board of review due to their similar design, construction, and some features. These sales also occurred more proximate in time to the subject's January 1, 2017 assessment date at issue. The homes, however, were smaller in dwelling size relative to the subject, thus requiring adjustments in order to make them more equivalent to the subject property. The Board is cognizant of the fact that comparables #1 and #2 are newer in age, and comparable #4 is older in age relative to the subject and has given this due consideration. The best comparable sale in this record sold from January 2016 to April 2017 for prices ranging from \$550,000 to \$575,000 or from \$204.81 to \$246.53 per square foot of living area, including land. The subject's assessment reflects a market value of \$627,484 or \$199.96 per square foot of living area, including land, which is above the range on an overall value basis, and below the range on a square-foot basis as established by the best comparable sales in the record. However, the subject's higher overall value appears to be supported given the subject's larger dwelling size relative to the best comparables in this record, as well as a screen porch amenity which the comparables lack. After considering adjustments to the comparables for differences from the subject, the Board finds that based on this evidence, the appellant did not prove by a preponderance of the evidence that the subject property is overvalued and, therefore, 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: June 16, 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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