



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

APPELLANT: Dimitrios Mellos
DOCKET NO.: 17-20882.001-R-1
PARCEL NO.: 11-31-303-059-0000

The parties of record before the Property Tax Appeal Board are Dimitrios Mellos, the appellant(s), by attorney Spiro Zarkos, of Verros Berkshire, PC in Chicago; 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: \$8,502
IMPR.: \$36,028
TOTAL: \$44,530

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 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 consists of a two-story, multi-family dwelling of masonry construction with 4,536 square feet of living area. The dwelling is 22 years old. The property has a 5,668 square foot site located in Rogers Park Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant disclosed the subject property was purchased on February 5, 2015 for a price of \$313,000. The appellant submitted a 2017 rent roll and a settlement statement. The settlement statement does not list the seller's name, has an illegible second page, and indicates the borrower is an LLC. The appellant also submitted a copy of a Quit Claim deed that indicates the grantor is the National Association for Debt Education and Assistance. The appellant did not complete Section IV-Recent Sale Data of the Property Tax Appeal Board's appeal form. Specifically, the appellant did

not indicate whether the subject was advertised for sale on the open market or whether the seller's mortgage was assumed. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$44,530. The subject's assessment reflects a market value of \$445,300, or \$98.17 per square foot of living area, land included, when using the 2017 level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The board of review submitted one sale comparable located within a quarter mile from the subject property. The comparable sold for a price of \$515,000, or \$91.05 per square foot of living area, including land. The board of review's grid sheet indicates the subject sold in 2016 for a price of \$1.

The Board notes the Property Tax Appeal Board issued a decision for the subject property in 2016, docket 16-20547.001-R-1, wherein a "No Change" was issued based on the same recent sale argument. Tax Years 2016 and 2017 are in the same triennial assessment period for properties located in Rogers Park Township.

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 Board takes judicial notice of its 2016 decision, docket 16-20547.001-R-1, wherein a "No Change" was issued based on the same recent sale argument. The Board gives little weight to the subject's sale as the appellant did not demonstrate that the sale had the elements of an arm's length transaction. The appellant did not indicate whether the property was not advertised or exposed on the open market or whether the seller's mortgage was assumed. Based on this record the Board finds the appellant did not prove by a preponderance of the evidence that the subject is overvalued 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: July 21, 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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