



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

APPELLANT: George Polymenakos  
DOCKET NO.: 17-27002.001-R-1 through 17-27002.002-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are George Polymenakos, 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 **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:

<b>DOCKET NO</b>	<b>PARCEL NUMBER</b>	<b>LAND</b>	<b>IMPRVMT</b>	<b>TOTAL</b>
17-27002.001-R-1	28-21-216-018-0000	2,177	11,390	\$13,567
17-27002.002-R-1	28-21-216-019-0000	2,177	4,881	\$7,058

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 multi-level dwelling of frame and masonry construction with 2,648 square feet of living area. The dwelling is 38 years old and has an effective age of 35. Features of the home include a full finished basement, central air conditioning, a fireplace and a two-car garage.<sup>1</sup> The property has two parcels of land that total approximately 13,400 square feet of land area and is located in Oak Forest, Bremen Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

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<sup>1</sup> The parties differ as to whether the subject's basement is finished and whether the subject has central air conditioning. The Board finds the best evidence of whether the subject has a finished basement to be the photograph within the appellant's appraisal depicting a finished basement. The Board also finds that the subject has central air conditioning based on the acknowledgment by the appellant's appraiser that a personal inspection of the subject was made.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an Ad valorem appraisal estimating the subject property had a market value of \$165,000 as of January 1, 2017.

The appellant's appraisal was completed using the sales comparison approach to value property in estimating a market value for the subject property. The appellant's appraiser selected three comparable properties that were located from .32 to 1.12 miles from the subject property. The comparables had lot sizes ranging from 6,700 to 75,750 square feet of land area. The comparables were described as multi-level dwellings that ranged in size from 2,075 to 2,633 square feet of living area. The comparables ranged in age from 42 to 57 years old. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates of June 2015 or December 2015 and sold for prices ranging from \$165,000 to \$167,000 or from \$63.43 to \$79.52 per square foot of living area, including land. After adjustments, the comparables had adjusted sale prices ranging from \$164,500 to \$188,500 or from \$62.48 to \$90.84 per square foot of living area, including land. Based on this sales analysis, the appraiser estimated that the subject would have a value of \$165,000 as of January 1, 2017.

The appraisal included a bathroom photograph, under which read, "First floor bath is NOT functional. Needs floor replacement, no sink, plumbing issues."

Based on this evidence the appellant requested that the subject's assessment be reduced to \$16,500.

The board of review submitted its "Board of Review Notes on Appeal." The total assessment for the subject, which includes two parcels of land, is \$20,625. The subject's assessment reflects a market value of \$206,250 or \$77.89 per square foot of living 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 a grid analysis containing information on four comparable properties that were located within the same neighborhood code as the subject property. Two of the comparables were located either .25 of a mile or on the same block as the subject. The comparables had lot sizes ranging from 6,700 to 30,375 square feet of land area. The comparables were described as 2-story dwellings that ranged in size from 2,142 to 3,183 square feet of living area. The comparables ranged in age from 13 to 26 years old. The comparables had other features with varying degrees of similarity to the subject. The comparables had sale dates ranging from May 2015 to October 2017 and sold for prices ranging from \$224,898 to \$375,000 or from \$93.75 to \$126.05 per square foot of living area, including land.

Based on this evidence the board of review requested that the subject's assessment be confirmed.

### **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.

As an initial matter regarding the appellant's appraisal, the Board gave less weight to the value conclusion due to the appraiser's use of sales that occurred greater than 12 months prior to the January 1, 2017 assessment date at issue, when the record contains three comparable sales from the board of review that occurred more proximate in time to the January 1, 2017 assessment date. The appraisal also included a sale located over a mile from the subject, which had a lot size greater than 5 times that of the subject.

The Board finds the best evidence of market value to be the board of review's comparable sales #1, #2 and #4. These comparables were similar to the subject in location, design and features. These comparables also sold more proximate in time to the January 1, 2017 assessment date at issue, than did the parties' remaining comparables. The Board acknowledges that one of the features of these best comparables are their superior age, which would require downward adjustments. The best comparables sold from September 2016 to October 2017 for prices ranging from \$224,898 to \$375,000 or from \$93.75 to \$126.05 per square foot of living area, including land. The subject's assessment reflects a market value of \$206,250 or \$77.89 per square foot of living area, including land, which falls below the range established by the best comparables in this record. However, the lower assessment appears justified after considering adjustments to the best comparables and taking into account the subject's nonoperational bathroom. The Board gave less weight to the parties' remaining comparable sales due to their sales occurring greater than 12 months prior to the January 1, 2017 assessment date at issue.

Based on this evidence in this record, the Board finds 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: November 17, 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

George Polymenakos, by attorney:  
George N. Reveliotis  
Reveliotis Law, P.C.  
1030 Higgins Road  
Suite 101  
Park Ridge, IL 60068

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602