

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Chryssoula Georgakopoulos
DOCKET NO.:	17-28248.001-R-1
PARCEL NO .:	08-33-303-039-0000

The parties of record before the Property Tax Appeal Board are Chryssoula Georgakopoulos, 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 <u>no change</u> 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:	\$3,712
IMPR.:	\$20,424
TOTAL:	\$24,136

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 55-year old, one-story dwelling of frame and masonry exterior construction with 1,695 square feet of living area. Features of the home include a concrete slab foundation,¹ central air conditioning, and a one-car garage. The property has an 8,250 square foot site and is located in Elk Grove Township, Cook County. The subject is classified as a class 2-03, residential property under the Cook County Real Property Assessment Classification Ordinance.

¹ The parties disagree as to the subject's foundation with the appellant reporting that the subject has a crawl-space foundation with a formal rec. room and the board of review describing the subject as having a concrete slab foundation. The Board finds that this factual dispute will not impact its ability to make an informed comparative analysis supported by the evidence in the record.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales of the same class as the subject and located within the same neighborhood code as the subject property. The comparables have sites ranging in size from 7,729 to 12,421 square feet of land area and are improved with class 2-03 dwellings of frame and masonry exterior construction that range in size from 1,335 to 1,659 square feet of living area. The dwellings range in age from 54 to 56 years old. Two comparable each have a crawl-space foundation and a two-car garage, and two comparables were built on a concrete slab foundation with each having a one-car garage. The comparables sold from December 2015 to September 2016 for prices ranging from \$170,000 to \$220,000 or from \$108.50 to \$134.72 per square foot of living area, including land. The appellant also submitted copies of Deeds associated with the four sales which disclosed the legal description and the legal rights being conveyed but lacked any physical description and/or sale data with regard to these properties. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$20,841.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$24,136. The subject's assessment reflects a market value of \$241,360 or \$142.40 per square foot of living area, land included, when applying the level of assessment for class 2 properties of 10% as determined by the Cook County classification ordinance.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales of the same class as the subject and located within the same neighborhood code as the subject property. The comparables have sites of either 8,030 or 10,203 square feet of land area and are improved with class 2-03 dwellings of frame or frame and masonry exterior construction that range in size from 1,310 to 1,796 square feet of living area. The dwellings are each either 55 or 56 years old. Three comparable each have a crawl-space foundation and one dwelling was built on a concrete slab foundation; two comparables each feature central air-conditioning and a fireplace; and each comparable has a 1-car or 1.5-car garage. The comparables sold from June to December 2016 for prices ranging from \$235,000 to \$289,000 or from \$144.71 to \$218.61 per square foot of living area, including land. The board of review also submitted color photographs of the subject and each of its comparables.

Based on this evidence, the board of review requested confirmation of 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 no reduction in the subject's assessment is warranted.

The parties submitted a total of eight comparables sales with varying degree of similarity to the subject in support of their respective positions. Each of the parties' comparables differed significantly from the subject in terms of smaller dwelling size, lack of central air-conditioning

amenity, larger garage feature, and/or larger site size. The Board gave less weight to appellant's comparable sale #4 based on its sale date in December 2015, a date less proximate in time to the January 1, 2017 assessment date at issue and, therefore, less likely to be indicative of the subject's market value as of the assessment date than the remaining sales in the record. The Board gives less weight to appellant's comparable #1, along with board of review sales #1, #3, and #4 due to differences from the subject dwelling in size.

The remaining two comparables sold in June and September 2016 for prices ranging from \$180,000 to \$259,900 or for \$108.50 and \$144.71 per square foot of living area, including land. The subject's assessment reflects a market value of \$241,360 or \$142.40 per square foot of living area, including land, which is within the range established by the two best comparable sales in this record. After considering adjustments to the best comparables for differences from the subject, the Board finds that the appellant did not establish by preponderance of the evidence that the subject property is overvalued and, therefore, no reduction in the subject's assessment 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:**

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:

March 16, 2021

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 <u>PETITION AND</u> <u>EVIDENCE</u> 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

Chryssoula Georgakopoulos, 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