

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Patricia Angelopoulos DOCKET NO.: 17-30811.001-R-1 PARCEL NO.: 09-34-216-017-0000

The parties of record before the Property Tax Appeal Board are Patricia Angelopoulos, 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:

**LAND:** \$7,497 **IMPR.:** \$62,476 **TOTAL:** \$69,973

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 dwelling of masonry exterior construction with 3,504 square feet of living area. The dwelling is 17 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace, and a two-car garage. The property has an 8,330 square foot site and is located in Park Ridge, Maine Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales that have the same neighborhood code as the subject. The comparables have sites ranging in size from 6,200 to 9,400 square feet of land area and are improved with class 2-78 dwellings of frame, masonry, or frame and masonry exterior construction that range in size from 2,551 to 3,730 square feet of living area and in age

from 1 to 51 years old. Each comparable has a full basement, with one having a finished formal rec. room, central air conditioning, one or three fireplaces, and a two-car garage. The sales occurred from February to December 2015 for prices ranging from \$440,000 to \$675,000 or from \$133.37 to \$185.20 per square foot of living area, inclusive of the land. The appellant requested the subject's assessment be reduced to \$59,887.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$69,973. The subject's assessment reflects a market value of \$699,730 or \$199.69 per square foot of living area, including land, when applying the 10% level of assessment for class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same neighborhood code and classification code as the subject. The comparables have sites ranging in size from 6,600 to 9,000 square feet of land area and are improved with two-story dwellings of masonry or frame and masonry exterior construction ranging in size from 2,922 to 3,689 square feet of living area and in age from 4 to 20 years old. Each property has a full basement, with two having a finished formal rec. room, central air conditioning, one or two fireplaces and a 2-car or a 2.5-car garage. The comparables sold from August 2014 to September 2015 for prices ranging from \$625,000 to \$1,100,000 or from \$198.04 to \$342.23 per square foot of living area.

## **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 record contains eight comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparables #1, #3 and #4 along with board of review comparable #1 due significant differences in age and/or dwelling size when compared to the subject. The Board gave less weight to the board of review comparable sale #4 due to the sale date that occurred over 24 months prior to the January 1, 2017 assessment date and thus, was less likely to be reflective of the subject's market value. The Board finds the best evidence of market value to be the appellant's comparable #2 and board of review comparables #2 and #3 which overall are most similar to the subject property in dwelling size, age, style and features. These comparables sold for prices ranging from \$625,000 to \$830,000 or from \$180.97 to \$254.60 per square foot of living area, including land. The subject's assessment reflects a market value of \$699,730 or \$199.69 per square foot of living area, including land, which falls within the range established by the best comparable sales in this record. Based on this evidence 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.

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Member	Member
Dan De Kinin	Sarah Bokley
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
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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 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**

Patricia Angelopoulos, 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