



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

APPELLANT: Angelo Laskaris
DOCKET NO.: 17-31239.001-R-1
PARCEL NO.: 09-26-410-001-0000

The parties of record before the Property Tax Appeal Board are Angelo Laskaris, 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 A Reduction 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: \$12,148
IMPR.: \$97,050
TOTAL: \$109,198

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 consists of a two-story dwelling of stucco construction with 5,794 square feet of living area. The dwelling is approximately 18 years old. Features of the home include a full unfinished basement, central air conditioning, two fireplaces, and a 3-car garage. The property has a 15,675 square foot site and is located in Park Ridge, Maine Township, Cook County. The subject is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The subject property is an owner-occupied residence that was the subject matter of an appeal before the Property Tax Appeal Board the prior year under Docket number 16-32742.001-R-1.¹ In that appeal the Property Tax Appeal Board rendered a decision lowering the assessment of the subject property to \$109,198. The Property Tax Appeal Board takes notice the 2016 and 2017

¹ The appellant's mailing address is the same as the subject property's address.

tax years are within the same general assessment period for Maine Township. (86 Ill.Admin.Code §1910.90(i)). The board of review also reported that 2016 was the beginning of the subject's general assessment cycle in its submission.

For this 2017 tax year appeal, the appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables that are located within the same neighborhood code as the subject. The comparables are improved with two-story dwellings of masonry exterior construction ranging in size from 5,253 to 6,425 square feet of living area. The dwellings range in age from 12 to 28 years old. Each comparable has a full basement with three having finished area, central air conditioning, from one to four fireplaces, and either a 2.5-car, a 3-car, or a 3.5-car garage. The comparables have improvement assessments ranging from \$74,500 to \$104,021 or from \$12.95 to \$16.19 per square foot of living area. Based on this evidence, the appellant requested that the improvement assessment be reduced to \$86,168 or \$14.87 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$110,125. The subject property has an improvement assessment of \$97,977 or \$16.91 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables that are located within the same neighborhood code as the subject. The comparables are improved with two-story dwellings of frame or masonry exterior construction ranging in size from 5,130 to 5,303 square feet of living area. The dwellings range in age from 16 to 22 years old. Each comparable has a partial or full basement with three having finished area, central air conditioning, two or three fireplaces, and either a 2-car, a 3-car, or a 4-car garage. The comparables have improvement assessments ranging from \$87,210 to \$95,887 or from \$17.00 to \$18.31 per square foot of living area. Based on this evidence, the board of review requested that the subject's assessment be confirmed.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin. Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted based on the appellant's appeal for assessment inequity.

Both parties submitted seven suggested comparables for the Board's consideration. The Board gives greater weight to the appellant's comparable #1 and the board of review comparable #2 because they have a similar full unfinished basement like the subject, whereas both parties remaining comparables have a dissimilar finished basement. The two best comparables have improvement assessments of \$12.95 and \$17.49 per square foot of living area. The subject's improvement assessment of \$16.91 per square foot of living area falls between the two best

comparables contained in this record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed.

Additionally, the Board finds the subject property is an owner-occupied residence that was the subject matter of an appeal before the Property Tax Appeal Board for the 2016 tax year under Docket number 16-32742.001-R-1. In that appeal, the Property Tax Appeal Board issued a decision lowering the assessment of the subject property to \$109,198 based on the evidence submitted by the parties.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) provides in part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.

Therefore, the Board finds that the prior year's decision should be carried forward to the 2017 tax year pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185). The Board takes notice and the board of review reported that 2016 and 2017 are within the same general assessment period for Maine Township. Additionally, the appellant's appeal form indicates the property is owner occupied since the appellant has the same mailing address as the subject property. Furthermore, the Cook County Property Tax Portal indicates the appellant received a homeowner exemption for the 2017 tax year at issue.² The record contains no evidence indicating the subject property sold in an arm's length transaction subsequent to the Board's decision or that the assessment year in question is in a different general assessment period or that the decision of the Property Tax Appeal Board for the 2016 tax year was reversed or modified upon review. For these reasons, the Property Tax Appeal Board finds that a reduction in the subject's assessment is warranted to reflect the Board's prior year's decision.

² See <http://www.cookcountypropertyinfo.com/pinresults.aspx>, 10/14/2020

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

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