

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: George Liakopouklos

DOCKET NO.: 17-33812.001-R-1 through 17-33812.002-R-1

PARCEL NO.: See Below

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

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
17-33812.001-R-1	17-19-414-034-0000	6,406	18,502	\$24,908
17-33812.002-R-1	17-19-414-035-0000	6,406	20,934	\$27,340

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 frame construction with 3,205 square feet of living area. The dwelling is 4 years old and features a full basement apartment and central air conditioning. The property has two parcels that total 6,250 square feet of land area and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 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 were located within the same neighborhood code as the subject property. The comparables had lots ranging in size from 3,000 to 4,562 square feet of land area that were improved with class 2-11 dwellings of frame or masonry construction. The dwellings ranged in size from 2,116 to 4,158 square feet of living

area and ranged in age from 87 to 132 years old. The comparables had other features with varying degrees of similarity to the subject. The comparables sold from June 2016 to July 2017 for prices ranging from \$259,000 to \$600,000 or from \$115.63 to \$148.87 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$42,829. The requested assessment would reflect a total market value of \$428,290 or \$133.63 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing that the total assessment for the subject of \$52,248 is being split between the subject's two parcels. The subject's total assessment reflects a market value of \$522,480 or \$163.02 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 information on four comparable sales that were located within the same neighborhood code as the subject property. The board of review submitted the same four properties, on two separate comparable grids, in support of each assessment for the subject's two parcels. The comparables had lots ranging in size from 2,977 to 3,375 square feet of land area that were improved with one-story, two-story or three-story multi-family dwellings of frame or masonry construction. The dwellings ranged in size from 1,949 to 3,060 square feet of living area and ranged in age from 8 to 17 years old. The comparables had other features with varying degrees of similarity to the subject. Three of the comparables did not have recent sales and are therefore not responsive to the overvaluation argument brought by the appellant. However, one of the comparables sold in September 2016 for \$307,000 or \$140.18 per square foot of living area, including land. 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 a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the board of review's comparable sale that sold for \$307,000 or \$140.18 per square foot of living area, including land. The subject's assessment reflects a market value of \$522,480 or \$163.02 per square foot of living area, including land, which is above the market value of the best comparable sale in this record. However, after adjusting the best comparable for differences when compared to the subject, such as its older age and smaller size, the Board finds the subject's assessment is supported. The Board gave less weight to the appellant's comparables due to their older ages, that range from 87 to 132 years old, when compared to the 4-year-old subject. 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.

2	1. Fer
	Chairman
C. R.	Robert Stoffen
Member	Member
Dan Dikinin	
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
	111-10-16
	Man O
	C1 1 C 1 D . T A 1D 1

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.

Docket No: 17-33812.001-R-1 through 17-33812.002-R-1

## 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 Liakopouklos, 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