



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

APPELLANT: Panagiotis Maravelias
DOCKET NO.: 17-38585.001-R-1
PARCEL NO.: 13-07-108-047-0000

The parties of record before the Property Tax Appeal Board are Panagiotis Maravelias, 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: \$3,437
IMPR.: \$16,277
TOTAL: \$19,714

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 one-story frame and masonry dwelling with 1,131 square feet of living area. The dwelling is approximately 58 years old. Features of the home include a full unfinished basement,¹ central air conditioning, and a 1.5-car garage. The property has a 3,125 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity with respect to the improvement as the bases of the appeal. In support of these arguments, the appellant submitted a grid analysis

¹ The appellant's grid analysis states that the subject has a "Craw (sic) and Formal Rec. Room" while the board of review's grid analysis states that the subject has a full unfinished basement. The Board gives more weight to the board of review's statement.

that contains information on four comparable properties along with a copy of the deed associated with the sale of each comparable. The comparables are located within the same neighborhood code as the subject property and are situated on sites that range in size from 3,003 to 3,480 square feet of land area. The sites are improved with class 2-03 dwellings of stucco, frame or masonry exterior construction that range in size from 1,008 to 1,760 square feet of living area and range in age from 54 to 93 years old. One comparable has a concrete slab foundation. Three comparables have full basements, one of which has finished area. Two of the comparables have either a 1-car or a 2-car garage. Comparable #3 was sold through foreclosure according to the deed submitted by appellant's counsel.

The comparables sold from October 2015 to February 2017 for prices ranging from \$150,000 to \$234,000 or from \$132.95 to \$155.61 per square foot of living area, including land, and have improvement assessments that range from \$16,014 to \$20,086 or from \$10.78 to \$15.89 per square foot of living area.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$16,308. The requested assessment would reflect a total market value of \$163,080 or \$144.19 per square foot of living area, land included, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance. The request would lower the subject's improvement assessment to \$12,871 or \$11.38 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 \$19,714. The subject's assessment reflects a market value of \$197,140 or \$174.31 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% as determined by the Illinois Department of Revenue. The subject has an improvement assessment of \$16,277 or \$14.39 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties located within the same neighborhood code as the subject. The comparables have sites that range in size from 2,500 to 3,720 square feet of land area. The sites are improved with 1-story class 2-03 dwellings of frame or masonry exterior construction that range in size from 1,000 to 1,004 square feet of living area and range in age from 52 to 76 years old. One comparable has a concrete slab foundation. Three comparables have full basements, one of which has finished area. One comparable has central air-conditioning. Three of the comparables have either a 1-car, 1.5-car or 2-car garage.

The comparables sold from March 2015 to November 2017 for prices ranging from \$238,000 to \$387,000 or from \$238.00 to \$385.46 per square foot of living area, land included. The comparables have improvement assessments that range from \$15,138 to \$17,342 or from \$15.14 to \$17.27 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part that 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 on this basis.

The parties submitted a total of eight suggested comparable sales, none of which are truly similar to the subject, for the Board's consideration. The Board gives less weight to appellant's comparables #1 and #2 and board of review comparables #2 and #4 as their 2015 sales are dated relative to the January 1, 2017 assessment date at issue. The Board also gives less weight to appellant's comparable #3 which sold through foreclosure calling into question the arm's length nature of the transaction.

The Board finds, in this limited record, the best evidence of market value to be appellant's comparable #4 and board of review comparables #1 and #3 which sold more proximate in time to the assessment date at issue and are similar to the subject property in location and some features. These comparables sold from June 2016 to November 2017 for prices ranging from \$230,000 to \$333,000 or from \$139.39 to \$332.00 per square foot of living area, including land. The subject's assessment reflects a market value of \$197,140 or \$174.31 per square foot of living area, including land, which falls below the range established by the best comparable sales in this record on an overall basis but within the range on a per square foot basis which is logical given the much larger dwelling size of the comparable at the bottom end of the per-square-foot range. After considering adjustments to the comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not justified based on overvaluation.

Alternatively, the taxpayer contends assessment inequity with respect to the improvement as a 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 on this basis.

Both parties used the same eight comparable properties for their inequity argument. The Board gives less weight to appellant's comparables #1, #2 and #4 and board of review comparables #1 and #2 which differ from the subject in dwelling size, foundation type and/or basement finish, and/or lack central air-conditioning, dissimilar to the subject.

The Board finds that appellant's comparable #3 and board of review comparables #3 and #4 were the best comparables submitted in this limited record and are generally similar to the subject property in location, design, dwelling size and most features, although all of these

comparables lack central air-conditioning and one of these comparables lacks a garage suggesting upward adjustments are necessary to make them more similar to the subject. These comparables had improvement assessments ranging from \$16,411 to \$17,342 or from \$14.92 to \$17.27 per square foot of living area. The subject's improvement assessment of \$16,277 or \$14.39 per square foot of living area falls below the range established by the best comparables submitted for the Board's consideration. Based on this record and after considering adjustments to the comparables for differences when compared to the subject, the Board finds that the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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:

October 19, 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 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

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