



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

APPELLANT: Nicholas Koufopoulos  
DOCKET NO.: 17-39009.001-R-1  
PARCEL NO.: 13-12-400-065-0000

The parties of record before the Property Tax Appeal Board are Nicholas Koufopoulos, 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:** \$9,450  
**IMPR.:** \$25,194  
**TOTAL:** \$34,644

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 building of masonry exterior construction with 1,938 square feet of building area. The building is approximately 98 years old. Features of the building include a full unfinished basement and a 2.5-car garage. The property has a 4,500 square foot site and is located in Chicago, Jefferson 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 and assessment inequity with respect to the improvement as the bases of the appeal. In support of the inequity argument, the appellant provided information on four comparable properties that were located in the same neighborhood code as the subject property. The comparables are improved with class 2-11, two-story multi-family buildings of frame or masonry exterior construction ranging in size from 1,980 to 2,272 square

feet of building area. The buildings range in age from 93 to 107 years old. The comparables have partial or full basements with one having a formal recreation room. Each comparable has a one-car or a two-car garage. The comparables have improvement assessments that range from \$22,021 to \$27,157 or from \$10.11 to \$13.00 per square foot of building area.

In support of the overvaluation argument, the appellant submitted information on four comparable sales located within the same neighborhood code as the subject property. The comparables have sites that range in size from 2,750 to 6,055 square feet of land area. The comparables are improved with class 2-11, two-story multi-family buildings of masonry or frame and masonry exterior construction ranging in size from 2,272 to 2,788 square feet of building area. The buildings range in age from 90 to 107 years old. The comparables have full basements with one having a formal recreation room. Each comparable has a one-car or a two-car garage. The comparables sold from January 2016 to October 2017 for prices ranging from \$437,500 to \$495,000 or from \$159.09 to \$195.86 per square foot of building area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$31,953. The requested assessment would reflect a total market value of \$319,530 or \$164.88 per square foot of building 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 request would lower the subject's improvement assessment to \$22,503 or \$11.61 per square foot of living area.

The appellant also submitted a copy of the decision of the board of review disclosing the subject property has a total assessment of \$40,303 reflecting a market value of \$403,030 or \$207.96 per square foot of building area, including land, when using the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The submission revealed the subject has an improvement assessment of \$30,853 or \$15.92 per square foot of living area.

The board of review did not submit its "Board of Review Notes on Appeal" nor any evidence in support of its assessed valuation of the subject property.

### **Conclusion of Law**

The appellant contends in part 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the board of review did not timely submit any evidence in support of its assessment of the subject property or to refute the evidence submitted by the appellant as required by section 1910.40(a) of the rules of the Property Tax Appeal Board and is in default

pursuant to section 1910.69(a) of the rules of the Property Tax Appeal Board. (86 Ill.Admin.Code §1910.40(a) & 1910.69(a)).

The Board finds the only evidence of assessment equity to be the appellant's comparables. These comparables are relatively similar to the subject in location, age, dwelling size and design, though one comparable has a finished recreation room in the basement unlike the subject and one comparable has a smaller one-car garage when compared to the subject's two-car garage. These comparables have improvement assessments that range from \$22,021 to \$27,157 or from \$10.11 to \$13.00 per square foot of building area. The subject's improvement assessment of \$30,853 or \$15.92 per square foot of building area is above the range established by the comparables in this record. After considering adjustments to the comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is warranted.

Alternatively, the appellant contends 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 record contains four comparable sales for the Board's consideration. After considering the assessment reduction granted to the subject property based on the assessment inequity argument, the Board finds a further reduction based on overvaluation is not appropriate. Therefore, no further 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

AGENCY

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