



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

APPELLANT: Peter Chrysanthou
DOCKET NO.: 17-39032.001-R-1
PARCEL NO.: 27-02-316-012-0000

The parties of record before the Property Tax Appeal Board are Peter Chrysanthou, 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: \$7,290
IMPR.: \$56,621
TOTAL: \$63,911

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 frame and masonry exterior construction with 4,436 square feet of living area. The dwelling is approximately 16 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace, and a three-car garage. The property has a 12,150 square foot site and is located in Orland Park, Orland Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation and assessment inequity. The land assessment was not contested. In support of the overvaluation argument, the appellant submitted evidence disclosing the subject property was purchased on July 10, 2015 for a price of \$485,000. The appellant partially completed Section IV – Recent Sale Data disclosing the sale was not between family or related parties, the property was sold at auction and was not advertised for sale. To

document the sale the appellant submitted copies of the Settlement Statement and Warranty Deed.

In support of the inequity argument, the appellant submitted information on four comparables located within the same neighborhood code as the subject. The comparables consist of class 2-08, two-story dwellings of masonry or frame and masonry exterior construction. The dwellings are 16 years old and range in size from 3,875 to 4,820 square feet of living area. Each comparable has a full unfinished basement, central air conditioning, one or two fireplaces and a three-car garage. The comparables have improvement assessments ranging from \$41,175 to \$57,627 or from \$10.63 to \$12.22 per square foot of living area.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$53,668 which would reflect a total market value of \$536,680 or \$120.98 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 requested reduced improvement assessment of \$46,378 would reflect an assessment of \$10.45 per square foot of living area.

The board of review submitted two "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$63,911. The subject's assessment reflects a market value of \$639,110 or \$144.07 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%. The subject property has an improvement assessment of \$56,621 or \$12.76 per square foot of living area.

In support of the subject's assessment, the board of review submitted information on four equity comparables and four comparable sales located within the same neighborhood code as the subject. The comparable sales have lots ranging in size from 13,388 to 59,198 square feet of land area and were improved with class 2-08, two-story dwellings of masonry or frame and masonry exterior construction. The comparables range in size from 4,274 to 4,925 square feet of living area and range in age from 10 to 19 years old. The comparables have partial or full basements, with three having formal recreation rooms. Other features of each comparable include central air conditioning, one to three fireplaces and a 3-car or a 3.5-car garage. The comparables sold from December 2016 to November 2017 for prices ranging from \$780,000 to \$960,000 or from \$169.71 to \$205.90 per square foot of living area, including land.

The equity comparables were improved with class 2-08, two-story dwellings of frame and masonry exterior construction. The comparables range in size from 3,889 to 4,349 square feet of living area and are either 10 or 16 years old. The comparables each have a full unfinished basement, central air conditioning, one or two fireplaces and a three-car garage. The comparables have improvement assessments ranging from \$56,432 to \$64,593 or from \$13.19 to \$14.85 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.

The Board gave little weight to the sale of the subject as the appellant partially completed Section IV and indicated the subject property was not advertised for sale which fails to meet one of the key fundamental elements of an arm's-length transaction reflective of market value. Furthermore, the sale of the subject occurred in July 2015 which is dated and less likely to be reflective of the subject's market value as of the January 1, 2017 valuation date.

The Board finds the best evidence of market value to be board of review comparables #2, #3 and #4 which sold more proximate in time to the subject's January 1, 2017 valuation date. These comparables are relatively similar to the subject in location, dwelling size, age and some features. However, they have formal recreation rooms in the basement unlike the subject's unfinished basement. These three comparables sold from December 2016 to November 2017 for prices ranging from \$780,000 to \$880,000 or from \$169.71 to \$205.90 per square foot of living area, including land. The subject's assessment reflects a market value of \$639,110 or \$144.07 per square foot of living area, including land, which is below the range of the best comparable sales in this record. The Board gave less weight to board of review comparable sale #1 due its significantly larger lot size when compared to the subject. Based on this evidence and after considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported.

Additionally, the appellant contends assessment inequity as another 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.

The parties submitted a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board gave less weight to appellant's comparables #3 and #4 along with board of review comparable #1 due to their smaller dwelling sizes when compared to the subject.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables in the record which are relatively similar to the subject in location, age, dwelling size and features. These five comparables have improvement assessments that range from \$51,238 to \$64,593 or from \$11.96 to \$14.85 per square foot of living area. The subject's improvement assessment of \$56,621 or \$12.76 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments to the best 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.

In conclusion, having examined the entire record, the Board finds that no change in the subject's assessment is warranted based either upon grounds of overvaluation or assessment inequity.

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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