



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

APPELLANT: Nick Reveliotis  
DOCKET NO.: 17-39085.001-R-1 through 17-39085.002-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Nick Reveliotis, the appellant(s), 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:

<b>DOCKET NO</b>	<b>PARCEL NUMBER</b>	<b>LAND</b>	<b>IMPRVMT</b>	<b>TOTAL</b>
17-39085.001-R-1	15-09-304-005-0000	1,562	10,498	\$12,060
17-39085.002-R-1	15-09-304-004-0000	1,562	0	\$1,562

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 is improved with a one-story dwelling of masonry construction containing 1,340 square feet of living area. The dwelling is approximately 99 years old. Features of the property include a full unfinished basement and a two-car detached garage. The property is composed of two adjacent parcels located in Bellwood, Proviso Township, Cook County. The subject is classified as a class 2-03 one-story residence and a class 2-41 vacant land under common ownership with adjacent residence under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity with respect to the improvement assessment as the bases of the appeal. The appellant was not contesting the land assessment for either parcel.

In support of the overvaluation argument the appellant submitted information on four comparable sales classified as class 2-03 properties improved with dwellings of masonry or frame and masonry construction ranging in size from 1,073 to 1,365 square feet of living area. The dwellings range in age from 58 to 71 years old. Each property has a full basement with two having finished area, three comparables have central air conditioning, and two comparables have two-car detached garages. The comparables have sites ranging in size from 3,843 to 5,400 square feet of land area. Each property has the same assessment neighborhood code as the subject property. The sales occurred from March 2016 to August 2017 for prices ranging from \$72,000 to \$125,000 or from \$67.10 to \$91.58 per square foot of living area, including land.

With respect to the assessment equity argument, the appellant submitted information on eight equity comparables improved with 1-story or 1.5-1.9-story class 2-03 dwellings of frame, masonry or frame and masonry construction ranging in size from 1,152 to 1,541 square feet of living area. The dwellings range in age from 59 to 71 years old. Five comparables have unfinished basements, three comparables have central air conditioning, one comparable has one fireplace, and seven comparables have a 1.5-car or 2-car detached garage. Four comparables have full attics with living area. Each property has the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$8,109 to \$12,124 or from \$7.03 to \$7.99 per square foot of living area.

The appellant requested the subject's total assessment for parcel number 15-09-304-005-000 be reduced to \$10,679 and the improvement assessment be reduced to \$9,087.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for parcel number 15-09-304-005-000 of \$13,381. The subject's assessment reflects a market value of \$133,810 or \$99.86 per square foot of living area, including land, when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The subject has an improvement assessment of \$11,819 or \$8.82 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales and four equity comparables. The comparable sales are improved with 1.5-story dwellings of masonry or frame and masonry construction ranging in size from 1,133 to 1,598 square feet of living area. The homes are either 70 or 91 years old and have the same classification code as the subject property. Each property has a full basement with two having finished area, two comparables have central air conditioning, and each property has a 1.5-car or 2-car garage. These properties have sites ranging in size from 4,305 to 5,400 square feet of land area. The comparables have the same assessment neighborhood code as the subject property. The sales occurred from February to December 2017 for prices ranging from \$195,000 to \$218,000 or from \$122.03 to \$92.41 per square foot of living area, including land. Board of review sale #1 is a subsequent sale of appellant's comparable #3.

With respect to the assessment equity argument, the board of review submitted information on four equity comparables improved with one-story class 2-03 dwellings of masonry construction ranging in size from 1,030 to 1,398 square feet of living area. The dwellings range in age from 77 to 92 years old. Each property has a full basement with one having finished area, two comparables have central air conditioning, and each comparable has a 1.5-car or 2-car garage.

Each property has the same assessment neighborhood code as the subject property. The comparables have improvement assessments ranging from \$9,817 to \$13,128 or from \$9.53 to \$10.82 per square foot of living area.

### **Conclusion of Law**

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

The parties submitted information on eight comparable sales. The Board gives less weight to the board of review comparable sales due to their 1.5-story style whereas the subject dwelling is improved with a one-story dwelling. The Board further finds that board of review sale #1, the subsequent sale of appellant's comparable #3, appears to be an outlier with a price per square foot above each comparable. Additionally, this property sold for 162% higher price than its previous sale in August 2016 suggesting significant improvements/upgrades were made to the dwelling following the previous sale. Less weight is given appellant's comparable #4 due to its newer age relative to the subject dwelling. The three remaining comparables provided by the appellant sold for prices ranging from \$83,200 to \$125,000 or from \$73.43 to \$91.58 per square foot of living area, including land. The subject's assessment, parcel number 15-09-304-005-000, reflects a market value of \$133,810 or \$99.86 per square foot of living area, including land, which is above the range established by the comparables. Based on this evidence the Board finds a reduction in the subject's assessment is justified on this basis.

Alternatively, the appellant 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). After considering the adjustment to the subject's assessment based on the market value, the Board finds a further reduction is not justified.

The record contains twelve equity comparables submitted by the parties with improvement assessments ranging from \$7.03 to \$10.82 per square foot of living area. After reducing the subject's assessment based on market value considerations, the subject has an improvement assessment of \$7.83 per square foot of living area, which is within the range established by the comparables. Based on this evidence the Board finds a further reduction in the subject's improvement assessment is not justified based on assessment equity.

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: March 16, 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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