

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Filippos Stolis
DOCKET NO.:	17-39115.001-R-1
PARCEL NO .:	27-13-307-029-0000

The parties of record before the Property Tax Appeal Board are Filippos Stolis, 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:

LAND:	\$ 5,000
IMPR.:	\$20,407
TOTAL:	\$25,407

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 masonry dwelling of masonry exterior construction that contains 1,938 square feet of living area. The home is approximately 30 years old. Features include a partial unfinished basement, central air conditioning, a fireplace and a two-car garage. The property has a 10,000 square foot site and is located in Orland Park, Orland Township, Cook County. The subject is classified as a class 2-04 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. The comparables had lots ranging in size from 9,125 to 10,020 square feet of land area and were improved with similar class 2-04 dwellings of masonry or frame and masonry exterior construction. The comparables ranged in size from 1,835 to 1,975

square feet of living area and were either 30 or 43 years old. Each comparable has a partial basement, two of which have formal recreation rooms. Each dwelling has central air conditioning and two comparables each have a fireplace. Each property has a two-car garage. The comparables sold from February 2016 to May 2017 for prices ranging from \$210,000 to \$238,000 or from \$114.44 to \$125.00 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$23,248. The requested assessment would reflect a total market value of \$232,480 or \$119.96 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 the total assessment for the subject of \$25,407. The subject's assessment reflects a market value of \$254,070 or \$131.10 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 and within the subarea of the subject. The comparables had lots ranging in size from 8,828 to 12,031 square feet of land area and were improved with similar class 2-04 one-story dwellings of masonry exterior construction. The comparables range in size from 1,815 to 2,024 square feet of living area and range in age from 44 to 46 years old. Each comparable has a partial unfinished basement, three comparables have central air conditioning and two comparables each have a fireplace. Each property has either a 2-car or a 2.5-car garage. The comparables sold from May 2016 to July 2017 for prices ranging from \$255,000 to \$328,990 or from \$140.50 to \$162.54 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 parties submitted a total of eight comparable sales which have varying degrees of similarity to the subject to support their respective positions before the Property Tax Appeal Board. The comparables are similar to the subject in location, age, design, size, foundation and most features. The comparables sold from February 2016 to July 2017 for prices ranging from \$210,000 to \$328,990 or from \$114.44 to \$162.54 per square foot of living area, including land. The subject's assessment reflects a market value of \$254,070 or \$131.10 per square foot of living area, including land, which is within the range established by the comparable sales in this record both in terms of overall value and on a per-square-foot basis. The Board further recognizes that

removing the high and low sale properties presented in this record narrows the range of sales prices from \$220,000 to \$289,000 which further supports the subject's estimated market value as reflected by its assessment. Therefore, based on the evidence and after considering adjustments to the comparables for differences when compared to the subject, 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.

Chairman Member Member Member Member **DISSENTING:**

<u>CERTIFICATION</u>

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 <u>PETITION AND</u> <u>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.

PARTIES OF RECORD

AGENCY

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APPELLANT

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COUNTY

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