



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

APPELLANT: Loukas Pergantas
DOCKET NO.: 17-42194.001-R-1
PARCEL NO.: 04-18-404-017-0000

The parties of record before the Property Tax Appeal Board are Loukas Pergantas, 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: \$24,347
IMPR.: \$33,167
TOTAL: \$57,514

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 dwelling of masonry exterior construction with 3,217 square feet of living area. The dwelling is approximately 41 years old. Features of the home include an unfinished partial basement, central air conditioning, a fireplace and a 2.5-car garage. The property has a 23,188 square foot site and is located in Northbrook, Northfield 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 and assessment inequity with respect to the improvement as the bases of the appeal. 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 18,250 to 24,937 square feet of land area. The comparables are improved with similar class 2-04 dwellings of masonry or frame

and masonry exterior construction ranging in size from 1,836 to 4,179 square feet of living area. The dwellings range in age from 40 to 56 years old. Each comparable has a full or partial basement, with one having finished area. The comparables each have central air conditioning, one to three fireplaces and a 2-car or a 2.5-car garage. The comparables sold from June 2016 to October 2017 for prices ranging from \$265,125 to \$600,000 or from \$144.40 to \$163.62 per square foot of living area, including land.

In support of the inequity argument, the appellant provided information on seven comparable properties that were located in the same neighborhood code as the subject property and within .31 of a mile from the subject. The comparables are similar class 2-04 properties improved with one-story dwellings of masonry or frame and masonry exterior construction ranging in size from 2,640 to 3,782 square feet of living area. The dwellings range in age from 40 to 59 years old. Each comparable has an unfinished partial basement, a fireplace and either a 2-car or a 2.5-car garage. Six comparables have central air conditioning. Comparable #7 has a partial unfinished attic. The comparables have improvement assessments that range from \$21,751 to \$33,841 or from \$6.59 to \$9.56 per square foot of living area.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$49,001. The requested assessment would reflect a total market value of \$490,010 or \$152.32 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 request would lower the subject's improvement assessment to \$24,654 or \$7.66 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 \$57,514. The subject's assessment reflects a market value of \$575,140 or \$178.78 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 has an improvement assessment of \$33,167 or \$10.31 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on eight comparable properties with equity data and four of which also sold. All comparables are located within the same neighborhood code as the subject property.¹ Two of the comparables were located within the same block as the subject, one comparable was within .25 of a mile from the subject and two comparables were located in the subject's subarea. The comparables have sites that range in size from 12,780 to 33,180 square feet of land area. The comparables are improved with 1-story or 1.5-story dwellings of masonry or frame and masonry exterior construction ranging in size from 2,599 to 3,446 square feet of living area. The dwellings range in age from 39 to 49 years old. Each comparable features a partial basement, with two having finished area. Seven comparables have central air conditioning, each comparable has one or two fireplaces and either a 2-car or a 2.5-car garage. The comparables have improvement assessments that range from \$31,931 to \$47,274 or from \$10.52 to \$14.97 per square foot of living area. Comparables #5 through #8 sold from June 2015 to July 2016 for prices ranging from \$470,000 to \$750,000 or from \$180.84 to \$258.11 per square foot of living area, including

¹ Board of review second set of four comparables were renumbered as comparables #5 through #8.

land. 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 parties submitted a total of eight suggested comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparable sales #3 and #4 due to their dissimilar dwelling sizes when compared to the subject. The Board gives reduced weight to board of review comparables #5 and #6 which differ from the subject in site size, dwelling size and/or design. The Board also gives reduced weight to the 2015 sale of board of review comparable #8 as it is somewhat dated and less likely to reflect the subject's market value as of the January 1, 2017 assessment date. The Board finds the best evidence of market value to be appellant's comparables #1 and #2, along with board of review comparable #7. These comparables are relatively similar to the subject in location, dwelling size, design, age and features. Although board of review comparable #7 has a finished basement unlike the subject's unfinished basement, the Board recognizes a downward adjustment would be warranted for this feature to make it more equivalent to the subject. These comparables sold from January 2016 to August 2017 for prices ranging from \$475,000 to \$750,000 or from \$157.67 to \$222.49 per square foot of living area, land included. The subject's assessment reflects a market value of \$575,140 or \$178.78 per square foot of living area, including land, which is within the range established by the best comparable sales 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 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.

The parties submitted 15 equity comparable properties for the Board's consideration that were located within the subject's neighborhood code. The Board gives less weight to the appellant's comparables #6 and #7, along with board of review comparables #5 and #6 which differ from the subject in dwelling size, age and/or design. The Board finds the best evidence of assessment equity to be the eleven remaining comparables. These comparables are relatively similar to the

subject in location, dwelling size, design, age and features, except board of review comparables #3 and #7 have finished basements suggesting a downward adjustment would be warranted to make them more equivalent to the subject. These comparables have improvement assessments that range from \$27,603 to \$47,274 or from \$8.65 to \$14.97 per square foot of living area. The subject's improvement assessment of \$33,167 or \$10.31 per square foot of living area is within the range established by the best comparables in this record. Based on this record, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment based on assessment uniformity 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: _____

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: April 20, 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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