



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

APPELLANT: Jim Matsas
DOCKET NO.: 17-44398.001-R-1
PARCEL NO.: 07-35-308-031-0000

The parties of record before the Property Tax Appeal Board are Jim Matsas, 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: \$3,265
IMPR.: \$15,869
TOTAL: \$19,134

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 exterior construction with 2,375 square feet of living area. The dwelling is approximately 44 years old. Features of the home include a full unfinished basement, central air conditioning and a two-car garage. The property has a 2,375 square foot site and is located in Roselle, Schaumburg Township, Cook County. The subject is classified as a class 2-95 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 the subject and three comparable sales which are located within the same neighborhood code as the subject property.¹ The comparables have sites ranging

¹ The appellant provided conflicting evidence regarding the purchase date of the subject property. The appellant reported in two separate comparable sales analyses that the subject was purchased in August 2016 for a price of

in size from 1,744 to 2,146 square feet of land area. The comparables are improved with similar class 2-95 dwellings of frame exterior construction each with 1,135 square feet of living area. Each dwelling is 44 years old. Each comparable has a full unfinished basement, central air conditioning and a one-car or a two-car garage. Comparable #1 has one fireplace. The properties sold from September 2015 to September 2017 for prices ranging from \$160,000 to \$185,000 or from \$140.97 to \$163.00 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$17,033, reflecting a market value of \$170,330 or \$150.07 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 \$19,134. The subject's assessment reflects a market value of \$191,340 or \$168.58 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 which are located within the same neighborhood code as the subject property. The comparables have sites ranging in size from 1,591 to 2,076 square feet of land area. The comparables are improved with similar class 2-95 two-story dwellings of frame or frame and masonry exterior construction with either 1,135 or 1,865 square feet of living area. The dwellings are either 16 or 44 years old. Each comparable has a full unfinished basement, central air conditioning and a one-car or a two-car garage. Two comparables each have one fireplace. The properties sold from April 2014 to August 2016 for prices ranging from \$200,000 to \$359,900 or from \$176.21 to \$209.69 per square foot of living area, land included. 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 provided eight suggested comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #1 and #2, along with board of review comparables #1 and #2 as their sales occurred in 2014 and 2015 which are somewhat dated and less likely to reflect the subject's market value as of the January 1, 2017 assessment date.

\$132.16 per square foot of living area and in October 2015 for a price of \$150,000 or \$132.16 per square foot of living area. The appellant provided a copy of the Judicial Sale Deed associated with the transfer of ownership of the subject property dated October 9, 2015. The Board finds there was no evidence presented by the appellant that the subject's sale meets the key fundamental elements of an arm's-length transaction to be considered reflective of market value.

The Board finds the best evidence of market value to be appellant's comparable sale #3 and board of review comparable sales #3 and #4. These comparables are identical to the subject in dwelling size, design, age and features, except the board of review comparables each have a smaller garage than the subject. The properties sold from May 2016 to September 2017 for prices ranging from \$185,000 to \$238,000 or from \$163.00 to \$209.69 per square foot of living area, including land. The subject's assessment reflects a market value of \$191,340 or \$168.58 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. After considering necessary adjustments to the comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its 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:

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

AGENCY

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