



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

APPELLANT: Fotini Papadakis  
DOCKET NO.: 18-38139.001-R-1  
PARCEL NO.: 12-14-112-022-0000

The parties of record before the Property Tax Appeal Board are Fotini Papadakis, 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:** \$6,258  
**IMPR.:** \$39,894  
**TOTAL:** \$46,152

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 2018 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 multi-family building of masonry exterior construction with 3,630 square feet of building area. The building is approximately 41 years old. Features of the building include a finished basement and a 2-car garage. The property has a 5,007 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 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 a comparable sales analysis and information on four comparables with the same neighborhood code as the subject property. The comparables have sites ranging from 3,777 to 6,362 square feet of land area that are improved with class 2-11 multi-family buildings of masonry exterior

construction ranging in size from 3,813 to 4,111 square feet of building area. The buildings range in age from 39 to 54 years old and have finished basements. Each comparable has a two-car garage. The comparables sold from February 2017 to August 2018 for prices ranging from \$420,000 to \$465,000 or from \$104.35 to \$113.11 per square foot of building area, including land.

In support of the assessment inequity argument, the appellant submitted a lack of uniformity analysis and information on four comparables with the same neighborhood code as the subject property. The comparables are class 2-11 multi-family buildings of frame or masonry exterior construction ranging in size from 3,080 to 4,600 square feet of building area. The comparables are 49 or 50 years old. One comparable has a concrete slab foundation, and three comparables each have a finished basement. Each comparable has from a 1-car to a 2.5-car garage. The comparables have improvement assessments ranging from \$30,630 to \$42,222 or from \$9.18 to \$9.94 per square foot of building area.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$40,633. The requested assessment would reflect a total market value of \$406,330 or \$111.94 per square foot of building 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 \$34,375 or \$9.47 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$46,152. The subject's assessment reflects a market value of \$461,520 or \$127.14 per square foot of building 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 \$39,894 or \$10.99 per square foot of building area.

In support of its contention of the correct assessment, the board of review submitted two grid analyses, each containing four comparables numbered 1 through 4. For ease of referencing, the grid analysis with four equity comparables, with one having sales data, will be renumbered as comparables #5 through #8. Seven comparables are located within the same neighborhood code as the subject property. The comparables are class 2-11 multi-family buildings of masonry or frame and masonry exterior construction ranging in size from 3,080 to 3,889 square feet of building area. The comparables range in age from 35 to 48 years old and have basements, two of which have finished area. Seven comparables each have central air conditioning and a 2-car garage. Comparables #1 through #5 have lot sizes ranging from 4,993 to 9,589 square feet of land area and sold from June 2015 to July 2018 for prices ranging from \$463,000 to \$565,000 or from \$131.13 to \$181.82 per square foot of building area, including land. Comparables #1 through #8 have improvement assessments ranging from \$36,799 to \$49,247 or from \$9.46 to \$13.90 per square foot of building area.

Based on this evidence the board of review requested that the subject's assessment be confirmed.

### **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 nine suggested comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparable sales #1, #2 and #4 as well as the board of review comparable #2 due to differences from the subject in age or lot size. Less weight is also given to the board of review comparables #3 and #4 that sold in 2015 or 2016 and are less likely to reflect the subject's market value as of the January 1, 2018 assessment date at issue for the subject property. The Board finds the best evidence of market value to be the appellant's comparable sale #3 as well as the board of review comparables #1 and #5 that sold more proximate in time to the January 1, 2018 assessment date. These comparables are also closer in age to the subject and similar to the subject in building size, foundation, and some features. In addition, the Board finds the board of review comparable #5 is the best comparable sale in the record because it is identical or nearly identical to the subject in lot size, building size, and age. These three comparables sold from February 2017 to July 2018 for prices ranging from \$429,900 to \$560,000 or from \$107.74 to \$181.82 per square foot of building area, including land. The subject's assessment reflects a market value of \$461,520 or \$127.14 per square foot of building area, including land, which falls within the range established by the best sales in this record and also below the best comparable sale in the record. After considering adjustments to the three best comparable sales for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified based on overvaluation.

The appellant also contends improvement assessment inequity as an alternative 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 twelve equity comparable properties for the Board's consideration. The Board has given less weight to the appellant's equity comparables as well as the board of review comparables #1 and #2 due to differences from the subject in building size, age, and/or lack of a basement or a garage. The Board finds the best comparables to be the board of review comparables #3 through #8 which are identical or nearly identical to the subject in building size and age, and are also relatively similar in other features. These six comparables have improvement assessments ranging from \$39,894 to \$49,247 or from \$10.99 to \$13.90 per square foot of building area. The subject's improvement assessment of \$39,894 or \$10.99 per square

foot of building area equals the comparable at the lowest end of the range established by the best equity comparables in this record. After considering adjustments to the six 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 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.



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Chairman



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Member



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Member

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Member

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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:

February 21, 2023



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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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