



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

APPELLANT: Spiro Sklavos
DOCKET NO.: 18-38285.001-R-1
PARCEL NO.: 13-04-228-112-0000

The parties of record before the Property Tax Appeal Board are Spiro Sklavos, 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 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:

LAND: \$3,414
IMPR.: \$15,941
TOTAL: \$19,355

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 consists of a one-story dwelling of frame and masonry exterior construction with 1,140 square feet of living area. The dwelling is approximately 64 years old. Features of the home include an unfinished basement and a one-car garage.¹ The property has a 2,134 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-10 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 completed Section IV – Recent Sale Data of the appeal petition reporting that the subject property was purchased on March 4, 2016 for a price of \$193,550 or \$169.78 per square

¹ Property characteristics not disclosed by the appellant were gleaned from the evidence presented by the board of review.

foot of living area, land included. The property was purchased from Dennis Morrissey and Cheryl Kolomay and the parties to the transaction were not related. The property was sold through a Realtor, Chicago Land Office, Inc., and was advertised for sale through the Multiple Listing Service (MLS) for a period of 68 days. In further support, a copy of the MLS data sheet was submitted depicting the original asking price of \$214,900 prior to the final sale and the listing period of 68 days. A copy of the Final Settlement Statement displayed a closing date of March 4, 2016 and the distribution of commissions to Chicagoland Brokers, Inc. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the 2016 purchase price at the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$21,532. The subject's assessment reflects a market value of \$215,320 or \$188.88 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 located in different neighborhood codes than the subject property. The comparables have lots ranging in size from 1,805 to 2,623 square feet of land area and were improved with two-story class 2-10 dwellings of masonry exterior construction. The comparables range in size from 882 to 1,326 square feet of living area and range in age from 65 to 75 years old. One comparable has a crawl space foundation and three comparables each have a basement, with one having a formal recreation room. One comparable has central air conditioning and one comparable has a two-car garage. The comparables sold from March 2016 to June 2017 for prices ranging from \$200,000 to \$312,000 or from \$199.96 to \$253.25 per square foot of living area, land included. The board of review's grid also disclosed the subject's sale in March 2016 for \$193,550. 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 appellant submitted documents supporting the recent purchase of the subject property and the board of review submitted four comparable sales for the Board's consideration. The Board gives less weight to the board of review comparable sales which differ from the subject in location and have dissimilar two-story designs when compared to the subject's one-story design. Additionally, one comparable lacks a basement foundation, three comparables lack central air conditioning, and three comparables lack a garage, all of which are features of the subject.

As a result, the Board finds the best and most credible evidence of the subject's market value to be the sale of the subject property in March 2016 for a price of \$193,550. The appellant's evidence demonstrated the sale had the elements of an arms-length transaction. The appellant disclosed the parties to the transaction were not related and that the property was advertised for sale in a multiple listing service. To document the sale, the appellant submitted a copy of the final settlement statement further disclosing a real estate commission was paid. In addition, the Board finds the board of review confirmed the sale date and price of the subject property but did not present any substantive evidence to challenge the arm's length nature of the subject's sale transaction or to submit any other documentary evidence to suggest that duress may have been involved in the sale transaction. The Board finds the subject's purchase price of \$193,550 falls below the market value reflected by the subject's assessment of \$215,320. Based on this record, the Board finds a reduction in the subject's assessment to reflect its sale price is warranted based upon the Cook County Real Property Assessment Ordinance level of assessment for Class 2 property of 10% and procedural rule 86 Ill.Admin.Code §1910.50.

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 16, 2024



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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