



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

APPELLANT: Dimitra Georgas
DOCKET NO.: 18-38315.001-R-1
PARCEL NO.: 13-01-210-006-0000

The parties of record before the Property Tax Appeal Board are Dimitra Georgas, 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: \$7,425
IMPR.: \$34,505
TOTAL: \$41,930

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 2-story multi-family dwelling of masonry exterior construction with 4,185 square feet of building area. The building is approximately 59 years old. The dwelling features a basement finished with an apartment¹ and a 2-car garage. The property has a 4,125 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 both overvaluation and assessment equity with respect to the subject's improvement as the bases of the appeal.

¹ The Board finds the best description of the subject's basement was provided by the board of review, which was not refuted by the appellant.

In support of the overvaluation argument, the appellant submitted information on four comparable sales with the same assessment neighborhood code as the subject property. The comparables have sites that range in size from 3,720 to 4,125 square feet of land area and are improved with class 2-11 multi-family dwellings of masonry exterior construction that range in size from 3,595 to 5,866 square feet of building area. The comparables range in age from 90 to 96. Three comparables each have a basement with one finished with an apartment and one comparable has a concrete slab foundation. One comparable has central air conditioning. One comparable has two fireplaces. Each comparable has a 2-car garage. These comparables sold from February 2016 to October 2017 for prices of \$315,000 to \$507,500 or from \$70.92 to \$95.10 per square foot of building area, land included.

As an alternate basis of the appeal, the appellant contends assessment inequity with respect to the improvement assessment. In support of this argument, the appellant submitted information on eight equity comparables with the same assessment neighborhood code as the subject property. The comparables are improved with 3-story class 2-11 multi-family dwellings of masonry exterior construction that range in size from 4,486 to 5,229 square feet of living area. The dwellings range in age from 90 to 92 years old. Each comparable has a basement with three finished with either an apartment or a recreation room and a 2-car or a 3-car garage. Three comparables each have central air conditioning. The comparables have improvement assessments that range from \$31,985 to \$39,848 or from \$7.07 to \$7.80 per square foot of living area.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$36,441 reflecting a market value of \$364,410 or \$87.08 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 \$29,016 or \$6.93 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 \$41,930. The subject's assessment reflects a market value of \$419,300 or \$100.19 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 subject has an improvement assessment of \$34,505 or \$8.24 per square foot of living area.

In support of its contention of the correct market value, the board of review submitted information on four comparable sales with the same neighborhood code as the subject property. The comparables have sites that range in size from 3,720 to 7,440 square feet of land area and are improved with 2-story class 2-11 multi-family dwellings that range in size from 3,374 to 4,500 square feet of living area. The dwellings range in age from 61 to 94 years old. Each comparable has a basement with one finished with a recreation room. One comparable has central air conditioning. Three comparables each have a 1.5-car to a 4-car garage. The comparables sold from May 2016 to March 2017 for prices ranging from \$420,000 to \$705,000 or from \$123.67 to \$156.67 per square foot of living area, land included.

In support of its contention of the correct assessment, the board of review submitted information on eight equity comparables² with the same assessment neighborhood code as the subject property. The comparables are improved with 2-story class 2-11 multi-family dwellings that range in size from 3,374 to 4,385 square feet of living area. The dwellings range in age from 62 to 94 years old. Seven comparables each have a basement with three finished with either an apartment or a recreation room and one comparable has a crawl space foundation. Two comparables each have central air conditioning. One comparable has one fireplace. Five comparables each have a 1.5-car or a 2-car garage. The comparables have improvement assessments that range from \$32,443 to \$52,081 or from \$9.62 to \$12.22 per square foot of living area.

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

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 eight comparable sales for the Board's consideration. The Board gives less weight to the appellants' comparables as well as board of review comparables #1, #2, and #4 which differ from the subject in dwelling size or have sale dates that are less proximate to the subject's January 1, 2018 valuation date at issue, and less likely to reflect the subject's market value for the assessment date at issue.

The Board finds the best evidence of market value to be the appellant's comparable #2 and board of review comparable #3 which are more similar to the subject in dwelling size and some features, but are considerably older dwellings than the subject, as well as lacking central air conditioning, which is a feature of the subject, suggesting upward adjustments for these differences would be necessary to make them more equivalent to the subject. In addition, each of these comparables has a garage, not a feature of the subject, suggesting downward adjustments for this difference would be necessary. These comparables sold in March and October 2017 for prices of \$370,000 and \$705,000 or for \$102.64 and \$156.67 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$470,120 or \$119.87 per square foot of living area, including land, which is bracketed by the best comparable sales in this record. Based on the record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment based on overvaluation request is not justified.

² The board of review's grid analysis with comparable sales also included equity data for each of these comparables. For the assessment equity argument, the Board will also consider these comparables and they will be renumbered #4 through #8 in the order they were presented in the evidence.

The taxpayer also contends 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 sixteen suggested equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #3, #4, #6, and #8 as well as board of review comparables #5 and #6 which differ from the subject in dwelling size.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are more similar to the subject in dwelling size and some features, except each of these comparables is a considerably older dwelling than the subject and has a garage, not a feature of the subject. Nevertheless, these comparables have improvement assessments that range from \$25,107 to \$45,385 or from \$6.66 to \$12.22 per square foot of living area. The subject's improvement assessment of \$39,647 or \$10.11 per square foot of living area falls within the range established by the best comparables in the record. Based on this record and after considering adjustments to the best comparable for differences from 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 is not justified on this basis.

In conclusion on this record, the Property Tax Appeal Board finds that the subject's assessment as established by the board of review is correct and no reduction 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:

February 21, 2023



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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