



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

APPELLANT: Nick Theodosis
DOCKET NO.: 18-44660.001-R-1
PARCEL NO.: 10-20-407-037-0000

The parties of record before the Property Tax Appeal Board are Nick Theodosis, 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: \$4,045
IMPR.: \$18,623
TOTAL: \$22,668

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 one-story dwelling of masonry exterior construction with 1,100 square feet of living area. The dwelling is 58 years old. Features of the home include a full unfinished basement, central air conditioning, and a 2-car garage. The property has a 5,580 square foot site and is located in Morton Grove, Niles Township, Cook County. The subject is classified as a class 2-03 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 that have the same neighborhood code as the subject. The comparables have sites that range in size from 4,125 to 6,820 square feet of land area. The comparables are improved with class 2-03 dwellings of masonry or frame and masonry exterior

construction that range in size from 1,254 to 1,675 square feet of living area and range in age from 65 to 75 years old. Three comparables each have a partial or a full basement with one having finished area, one comparable has a crawl space foundation, two comparables have a fireplace, and each comparable has central air conditioning and a one-car or a two-car garage. The properties sold from December 2016 to August 2017 for prices ranging from \$223,000 to \$264,000 or from \$147.10 to \$179.55 per square foot of living area, land included.

In support of the inequity argument, the appellant submitted information on seven equity comparables that have the same neighborhood code as the subject. The comparables are improved with class 2-03, one-story dwellings of masonry, frame, or frame and masonry exterior construction that range in size from 1,050 to 1,288 square feet of living area and range in age from 55 to 69 years old. The comparables each have a partial or a full basement with three having finished area. Six comparables have central air conditioning and each comparable has a 1-car to a 2.5-car garage. The comparables have improvement assessments ranging from \$15,903 to \$18,998 or from \$13.74 to \$16.19 per square foot of living area.

Based on this evidence, the appellant requested the subject's assessment be reduced to \$19,431, reflecting a market value of \$194,310 or \$176.65 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 \$15,386 or \$13.99 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 \$22,668. The subject's assessment reflects a market value of \$226,680 or \$206.07 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 \$18,623 or \$16.93 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables that have the same neighborhood code as the subject. The comparables are improved with class 2-03, 1-story or 1.5-story dwellings of frame, masonry, or frame and masonry exterior construction ranging in size from 1,066 to 1,260 square feet of living area. The dwellings range in age from 64 to 69 years old. Three comparables have full unfinished basements and one comparable has a crawl space foundation. Three comparables have central air conditioning. Three comparables each have one or two fireplaces. Each comparable has a 1.5-car or a 2-car garage. The comparables sold from May 2017 to December 2017 for prices ranging from \$315,000 to \$365,000 or from \$282.63 to \$295.50 per square foot of living area, including land. The comparables have improvement assessments ranging from \$14,807 to \$21,963 or from \$13.89 to \$17.43 per square foot of living area. Based on the evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part 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 record contains eight comparable sales for the Board's consideration. The Board gives reduced weight to appellant's comparables #1, #3 and #4 as well as board of review comparable #1 due to differences from the subject dwelling in size and foundation type.

The Board finds the best evidence of market value to be appellant's comparable #2 along with board of review comparables #2, #3 and #4 which are similar to the subject in location, age, dwelling size and most features. These comparables sold from March 2017 to October 2017 for prices ranging from \$230,000 to \$365,000 or from \$179.55 to \$295.50 per square foot of living area, including land. The subject's assessment reflects a market value of \$226,680 or \$206.07 per square foot of living area, including land, which is within the range established by the best comparable sales on a price per square foot basis and below on overall market value. After considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified.

The appellant also argued 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. The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains eleven equity comparables for the Board's consideration. The Board gives less weight to appellant's comparables #3, #6 and #7 along with board of review comparables #1 and #3 due to lack of a basement, having finished basement area or lack central air conditioning when compared to the subject. The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are relatively similar to the subject in location, class, age, dwelling size and features. These comparable have improvement assessments ranging from \$15,903 to \$21,963 or from \$15.15 to \$17.43 per square foot of living area. The subject has an improvement assessment of \$18,623 or \$16.93 per square foot of living area, which falls within the range established by the best comparables in this record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is supported and therefore, a reduction in the subject's assessment 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:

December 20, 2022



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Nick Theodosis, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602