



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

APPELLANT: Nikolaos Manousopoulos
DOCKET NO.: 18-44684.001-R-1
PARCEL NO.: 30-20-406-037-0000

The parties of record before the Property Tax Appeal Board are Nikolaos Manousopoulos, 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: \$1,653
IMPR.: \$1,737
TOTAL: \$3,390

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 1.5-story dwelling of frame and masonry exterior construction with 1,137 square feet of living area. The dwelling is approximately 67 years old. Features of the home include a full unfinished basement and a one-car garage. The property has a 4,725 square foot site and is located in Calumet City, Thornton 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 as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales that were located within the same neighborhood code as the subject. The comparables have lots ranging in size from 4,725 to 5,100 square feet of land area. The parcels are each improved with similar class 2-03 dwellings of masonry or frame and masonry exterior construction. The comparables range in size from

1,126 to 1,283 square feet of living area and are either 66 or 67 years old. Each comparable has a full basement, two of which have formal recreation rooms. Three dwellings have central air conditioning and each comparable has either a 1.5-car or a 2-car garage. The comparables sold from December 2016 to January 2018 for prices ranging from \$20,000 to \$40,100 or from \$17.64 to \$34.48 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$3,077. The requested assessment would reflect a total market value of \$30,770 or \$27.06 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 \$6,272. The subject's assessment reflects a market value of \$62,720 or \$55.16 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 that were located within the same neighborhood code as the subject. The comparables have lots ranging in size from 6,090 to 6,666 square feet of land area and are improved with similar class 2-03 one-story dwellings of frame or frame and masonry exterior construction. The comparables range in size from 1,147 to 1,215 square feet of living area and range in age from 60 to 94 years old. Three of the comparables have a concrete slab foundation and comparable #1 has a full unfinished basement. One comparable has a fireplace and each property has either a 1.5-car or a 2-car garage. The comparables sold from December 2017 to August 2018 for prices ranging from \$71,000 to \$149,500 or from \$61.90 to \$127.13 per square foot of living area, including land.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of eight comparable sales which have varying degrees of similarity to the subject to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1 and #2 along with board of review comparable #2, #3 and #4. These two appellant comparables each have finished basement area which is not a feature of the subject dwelling and furthermore these sales occurred less proximate in time to the valuation date at issue of January 1, 2018. These three board of review comparables are each inferior to the subject in foundation type with concrete slab foundations as compared to the subject's full unfinished basement. Furthermore, the Board has given reduced

weight to board of review comparable sale #1 which, based on the other sales in the record, appears to be a high-end outlier without further explanation why its sale price would be so substantially greater than any of the other sales in this record particularly when this dwelling is also reported to be 94 years old.

The Board finds the best evidence of market value to be the appellant's comparable sales #3 and #4. These comparables are most similar to the subject in location, design, age, dwelling size and foundation type. Each of these comparables has superior garage size and air conditioning which differ from the subject. These comparables sold in August 2017 and January 2018 for prices of \$20,000 and \$39,000 or for \$17.64 and \$34.48 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$62,720 or \$55.16 per square foot of living area, including land, which is above the best comparable sales in this record both in terms of overall value and on a per-square-foot basis. Based on this evidence 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 is 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:

November 22, 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

Nikolaos Manousopoulos, 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