

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Mihalis Vassos
DOCKET NO.:	18-46279.001-R-1
PARCEL NO .:	10-23-316-060-0000

The parties of record before the Property Tax Appeal Board are Mihalis Vassos, 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 <u>no change</u> 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:	\$4,059
IMPR.:	\$16,106
TOTAL:	\$20,165

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 a masonry exterior construction with 1,006 square feet of living area. The dwelling is approximately 58 years old. Features of the home include a full basement, central air conditioning and a two-car garage. The property has a 4,920 square foot site and is located in Skokie, 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 as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales with the same assessment neighborhood code as the subject property. The comparables have sites containing 4,920 or 4,960 square feet of land area. The comparables are improved with class 2-03 dwellings of masonry exterior construction ranging in size from 1,222 to 1,645 square feet of living area. The

dwellings range in age from 58 to 64 years old. One comparable has a concrete slab foundation and three comparables each have either a full or partial basement, one of which has finished area. Three comparables have central air conditioning, one comparable has a fireplace and one comparable has a two-car garage. The properties sold from July 2016 to November 2018 for prices ranging from \$225,000 to \$279,000 or from \$169.60 to \$184.12 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$18,030, reflecting a market value of \$180,300 or \$179.22 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 \$20,165. The subject's assessment reflects a market value of \$201,650 or \$200.45 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 properties consisting of three equity comparables identified as #1, #2 and #4. As equity data is not responsive to the appellant's overvaluation argument, this data will not be further examined.

Comparable #3 consists of a sale property with the same assessment neighborhood code as the subject and located within the same block as the subject property. The lot contains 4,920 square feet of land area and is improved with a class 2-03 one-story dwelling of masonry exterior construction. The home contains 1,068 square feet of living area and is 57 years old. The dwelling has a full basement, central air conditioning and a two-car garage. The property sold in April 2017 for \$360,000 or \$337.08 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains five suggested comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #2, #3 and #4 due to their larger dwelling sizes when compared to the subject. Furthermore, the appellant's comparable #3 has a sale that occurred in 2016, less proximate in time to the assessment date at issue, and thus less likely to reflect the subject's market value as of the January 1, 2018 assessment date.

The Board finds the best evidence of market value to be the appellant's comparable #1 and board of review comparable #3, which have the same property classification as the subject and are

relatively similar to the subject in location, dwelling size and age. The comparables sold in April 2017 and October 2018 for prices of \$225,000 and \$360,000 or for \$184.12 and \$337.08 per square foot of living area, including land. The subject's assessment reflects a market value of \$201,650 or \$200.45 per square foot of living area, including land, which is less than the two best comparable sales in this record in terms of overall market value but bracketed by the comparables on a price per square foot basis. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds no reduction in the subject's estimated market value as reflected by its assessment 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:**

<u>CERTIFICATION</u>

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 <u>PETITION AND</u> <u>EVIDENCE</u> 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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APPELLANT

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COUNTY

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