



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

APPELLANT: Dimitrios Mellos
DOCKET NO.: 19-21211.001-R-1
PARCEL NO.: 11-31-303-059-0000

The parties of record before the Property Tax Appeal Board are Dimitrios Mellos, the appellant, by attorney Spiro G. Zarkos of Verros Berkshire, PC in Oakbrook Terrace; 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: \$9,635
IMPR.: \$31,282
TOTAL: \$40,917

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 2019 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 two-story multi-family building of masonry exterior construction with 4,536 square feet of building area. The building is approximately 25 years old. The building features a full basement that is finished with an apartment. The property has a 5,668 square foot site and is located in Chicago, Rogers Park 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 assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables that have the same assessment neighborhood code as the subject and are located either 1.3 or 1.5 miles from the subject property. The comparables are class 2-11 properties improved with multi-family buildings of masonry exterior construction ranging in size from

5,876 to 6,230 square feet of building area. The buildings are 63 to 96 years old. One comparable has a concrete slab foundation and three comparables each have a full basement, one of which is finished with an apartment. Three comparables each have a three-car garage. The comparables have improvement assessments that range from \$34,973 to \$37,079 or from \$5.87 to \$6.00 per square foot of building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$26,944 or \$5.94 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$40,917. The subject property has an improvement assessment of \$31,282 or \$6.90 per square foot of building area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables, two of which are located in the same block as the subject property and have the same assessment neighborhood code as the subject. The comparables are class 2-11 properties improved with two-story multi-family buildings of masonry exterior construction ranging in size from 3,360 to 3,976 square feet of living area. The buildings are either 24 or 63 years old. Each comparable has a full basement, two of which are finished with an apartment. Three comparables have central air conditioning and two comparables each have a two-car garage. The comparables have improvement assessments that range from \$23,755 to \$31,354 or from \$7.07 to \$9.33 per square foot of building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the 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 a total of eight comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables, as well as board of review comparables #1 and #2 which are less similar to the subject in building size and/or they have a garage, not a feature of the subject. Additionally, the appellant's comparables #1, #2 and #4 are 65 to 71 years older than the subject building and board of review comparables #1 and #2 have a different neighborhood code than the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #3 and #4, which have the same assessment neighborhood code as the subject. However, the Board finds these two comparables are 38 years older than the subject and have smaller building sizes with no basement apartment, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Additionally, comparable #4 has central air conditioning, not a feature of the subject, suggesting a downward adjustment would be

necessary. Nevertheless, the comparables have improvement assessments of \$28,307 and \$28,310 or \$7.12 per square foot of building area. The subject's improvement assessment of \$31,282 or \$6.90 per square foot of building area is greater than the two best comparables in the record in terms of total improvement assessment but below the comparables on a per square foot basis. The subject's higher total improvement assessment appears to be justified given its newer age, larger building size and basement apartment. Therefore, based on this record and after considering adjustments to the best comparables for differences when compared to 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.

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:

May 21, 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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