



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

APPELLANT: Peter Dalmangas
DOCKET NO.: 19-34683.001-R-1
PARCEL NO.: 09-23-103-102-0000

The parties of record before the Property Tax Appeal Board are Peter Dalmangas, 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: \$12,865
IMPR.: \$85,959
TOTAL: \$98,824

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 dwelling of masonry construction with 5,281 square feet of living area. The dwelling is approximately 19 years old. Features of the home include a full basement,¹ central air conditioning, two fireplaces and a 3-car garage. The property has a 14,295 square foot site and is located in Park Ridge, Maine Township, Cook County. The subject is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on May 8, 2017 for a price of

¹ The record is unclear as to the basement finish of the subject property. While the board of review's grid analysis shows the basement is unfinished, in Section III of the residential appeal, appellant's counsel marked that the basement as finished. This discrepancy will not impact the Board's decision.

\$690,000. Appellant's counsel partially completed Section IV – Recent Sale Data of the Residential Appeal form disclosing that the property was purchased from Vincent and Josephine Safratello and was sold by a Realtor but was not advertised for sale. Appellant's counsel submitted a Master Statement and Closing Statement which show the sale price as \$690,000 and that a commission of \$20,000 was paid to Platinum Realty Incorporated, along with a copy of the Warranty Deed to appellant. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price of \$690,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$98,824. The subject's assessment reflects a market value of \$988,240 or \$187.13 per square foot of living area, land included, when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The board of review noted that 2019 was the first year of the general assessment cycle for the subject property.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales, none of which have the same neighborhood code as the subject property but all 121 of which are located in Park Ridge, as is the subject. The comparables consist of two-story masonry, stucco or frame dwellings that range from 10 to 96 years old. The dwellings range in size from 5,021 to 5,535 square feet of living area. Each dwelling has a basement, three with finished area, central air conditioning, two or three fireplaces, and a 2-car to a 3.5-car garage. The dwellings are situated on sites ranging in size from 12,760 to 17,942 square feet of land area. The properties sold from June 2016 to November 2018 prices ranging from \$950,000 to \$1,575,000 or from \$188.19 to \$284.55 per square foot of living area, land included. Based on the above 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 Board gave less weight to the May 2017 sale of the subject property and the June 2016 sale board of review comparable #4 which are dated relative to the January 1, 2019 assessment date at issue. The Board also gave less weight to board of review comparable #2 as the dwelling is 77 years older than the subject property and has a stucco exterior, dissimilar to the subject's masonry exterior.

The Board finds the best evidence of market value to be board of review comparable sales #1 and #3. These comparables are similar to the subject property in location, age, design, size and most features and sold more proximate in time to the assessment date at issue. These two best comparables sold in January 2018 and December 2017 for \$950,000 and \$1,110,000 or for \$188.19 and \$221.07 per square foot of living area, including land, with board of review

comparable #1 being the most similar comparable to the subject in the record, but for its 2-car garage as opposed to the subject which features a 3-car garage. The subject's assessment reflects a market value of \$988,240 or \$187.13 per square foot of living area, including land, which is supported by the best comparable sales in this record. After considering adjustments to the comparables for differences from the subject, the Board finds 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: October 19, 2021



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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