

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:	Charalabos Rammos
DOCKET NO .:	20-08033.001-R-1
PARCEL NO .:	03-15-412-022

The parties of record before the Property Tax Appeal Board are Charalabos Rammos, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; and the DuPage 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 **DuPage** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND:	\$34,660
IMPR.:	\$64,120
TOTAL:	\$98,780

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the DuPage County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2020 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 split-level¹ dwelling of brick and frame exterior construction with 1,353 square feet of living area. The dwelling was constructed in 1963. Features of the home include a finished lower level, central air conditioning, a fireplace, and an attached 506 square foot garage. The property has an approximately 12,580 square foot site and is located in Wood Dale, Addison Township, DuPage County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales, two of which have the same neighborhood code as the subject. The comparables have sites that range in size from 7,644 to 12,320 square feet of land area. The comparables are improved with split-level or raised ranch dwellings of brick and frame exterior construction ranging in size from 1,333 to 1,438 square

¹ The Board finds the best description of the subject is found in the property record card supplied by the board of review.

feet of living area that were built from 1963 and 1965. Each comparable is reported to have a lower level with finished area, with one having an additional basement with finished area, central air conditioning, one fireplace and either a built-in or an attached garage ranging in size from 506 to 530 square feet of building area². The comparables sold from January 2017 to February 2019 for prices ranging from \$261,000 to \$290,000 or from \$188.18 to \$213.80 per square foot of living area, including land. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$98,780. The subject's assessment reflects a market value of \$295,749 or \$218.59 per square foot of living area, land included, when using the 2020 three-year average median level of assessment for DuPage County of 33.40% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review, through the township assessor, submitted information on five comparable sales located in the same neighborhood code as the subject, together with a map depicting the locations of these comparables in relation to the subject. The board of review's comparables #2 and #3 are the same properties as the appellant's comparables #3 and #2, respectively. The comparables have sites ranging from 4,700 to 13,932 square feet of land area. The comparables are improved with either raised ranch or split-level dwellings of brick and frame exterior construction ranging in size from 1,232 to 1,505 square feet of living area. The dwellings were built from 1963 to 1967. Each comparables has a finished lower-level, with two having an additional basement with finished area, central air conditioning and an attached garage ranging in size from 504 to 517 square feet of building area. Four comparables each have one fireplace and comparable #4 has an additional detached garage with 561 square feet of building area. The comparables sold from January 2017 to May 2019 for prices ranging from \$279,000 to \$325,000 or from \$201.67 to \$261.36 per square foot of living area, including land.

The board of review submitted a memorandum along with the PTAX-203 for the subject, stating that the property sold in 2016 for \$345,000.

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.

 $^{^{2}}$ Descriptive information of the comparables not reported by the appellant was found in the listing sheets supplied by the appellant and the board of review.

The record contains six suggested comparable sales for the Board's consideration, two of which are common to both parties. The Board has given less weight to the appellant's comparables along with the board of review's comparables #1, #2 and #3, which includes the two common comparables, due to their additional finished basement area and/or their sale dates occurring in 2017 or 2018, which sold less proximate in time to the January 1, 2020, assessment date given other sales available in the record.

The Board finds the best evidence of market value to be the board of review's comparables #4 and #5. The Board finds these comparables sold more proximate in time to the assessment date at issue and are similar to the subject in age, dwelling size and some features. These most similar comparables sold in April and May 2019 for prices of \$279,000 and \$322,000 or for \$226.46 and \$261.36 per square foot of living area, including land. The subject's assessment reflects a market value of \$295,749 or \$218.59 per square foot of living area, including land, is bracketed by the best comparable sales in the record in terms of overall market value but below the best comparables ono 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 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:**

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:

April 18, 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

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

APPELLANT

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COUNTY

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