



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

APPELLANT: Peter Paleothodoros
DOCKET NO.: 20-44478.001-R-1
PARCEL NO.: 15-33-204-011-0000

The parties of record before the Property Tax Appeal Board are Peter Paleothodoros, 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: \$3,360
IMPR.: \$19,451
TOTAL: \$22,811

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 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 1-story dwelling of frame and masonry exterior construction with 1,176 square feet of living area. The dwelling is approximately 63 years old. Features of the home include a basement with finished area, central air conditioning, and a 1-car garage. The property has a 5,600 square foot site and is located in La Grange Park, Proviso 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 both overvaluation and assessment inequity concerning the improvement as the bases of the appeal. In support of the overvaluation argument, the appellant submitted information on four comparable sales located within the same assessment neighborhood code as the subject. The comparables have sites of 6,250 or 7,500 square feet of land area that are improved with class 2-03 homes of masonry, stucco, or frame and masonry exterior construction

ranging in size from 1,076 to 1,553 square feet of living area. The dwellings range in age from 65 to 96 years old. Each home has a basement, three of which have finished area, and a 1-car garage. Three homes have central air conditioning. The comparables sold from July 2019 to July 2020 for prices ranging from \$180,000 to \$250,000 or from \$143.90 to \$167.29 per square foot of living area, including land.

The appellant also submitted information on four equity comparables located within the same assessment neighborhood code as the subject and within 0.20 of a mile from the subject. The comparables are improved with 1-story or 1.5 to 1.9-story homes of masonry or frame and masonry exterior construction ranging in size from 1,279 to 1,400 square feet of living area. The dwellings range in age from 54 to 70 years old. Each home has a basement, one of which has finished area. One home has central air conditioning and three homes have a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$18,714 to \$21,602 or from \$13.76 to \$15.44 per square foot of living area.

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 \$22,811. The subject's assessment reflects a market value of \$228,110 or \$193.97 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%. The subject has an improvement assessment of \$19,451 or \$16.54 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables located within the same assessment neighborhood code as the subject and within 0.25 of a mile from the subject. The comparables have 6,250 square foot sites that are improved with 1-story, class 2-03 homes of frame and masonry exterior construction ranging in size from 1,057 to 1,178 square feet of living area. The dwelling range in age from 64 to 70 years old. Each home has a basement, two of which have finished area, and from a 1-car to a 2.5-car garage. Two homes have central air conditioning and one home has a fireplace. The comparables have improvement assessments ranging from \$20,970 to \$22,724 or from \$19.29 to \$19.93 per square foot of living area. Two comparables sold in May 2017 and February 2020 for prices of \$345,000 and \$239,514 or \$292.98 and \$209.18 per square foot of living area, including land, respectively. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends in part 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 record contains a total of six comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables #3 and #4, due to substantial differences from

the subject in dwelling size or age. The Board gives less weight to the board of review's comparable #3, which sold less proximate in time to the assessment date than the other comparables in this record.

The Board finds the best evidence of market value to be the appellant's comparables #1 and #2 and the board of review's comparable #1, which sold more proximate in time to the assessment date and are more similar to the subject in dwelling size, age, location, and features, although one home lacks finished basement area that is a feature of the subject, suggesting an upward adjustment to this comparable would be needed to make it more equivalent to the subject. These comparables sold for prices ranging from \$180,000 to \$239,514 or from \$161.46 to \$209.18 per square foot of living area, including land. The subject's assessment reflects a market value of \$228,110 or \$193.97 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not justified.

The appellant also 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 record contains a total of eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables, which are less similar to the subject in dwelling size than the other comparables in this record or lack a garage that is a feature of the subject.

The Board finds the best evidence of assessment equity to be the board of review's comparables, which are more similar to the subject in dwelling size, age, location, and features, although two homes lack finished basement area that is a feature of the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables have improvement assessments ranging from \$20,970 to \$22,724 or from \$19.29 to \$19.93 per square foot of living area. The subject's improvement assessment of \$19,451 or \$16.54 per square foot of living area falls below the best comparables in this record. Based on this evidence, and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement is inequitably assessed and no reduction in the subject's improvement 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: June 18, 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

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

APPELLANT

Peter Paleothodoros, 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