FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Nikolaos Manousopoulos
DOCKET NO.: 21-28820.001-R-1
PARCEL NO.: 30-17-309-021-0000

The parties of record before the Property Tax Appeal Board are Nikolaos Manousopoulos, 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:	$1,638
IMPR.:	$5,075
TOTAL:	$6,713

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 2021 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 frame exterior construction with 1,056 square feet of living area.[1] The dwelling is approximately 96 years old. Features of the home include a full unfinished basement and a 1.5-car garage. The property has an approximately 4,680 square foot site and is located in Calumet City, Thornton 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 lack of assessment uniformity regarding the improvement as the bases of the appeal.

[1] The Board finds the best description of the subject is found in the property characteristic printout provided by the appellant.

In support of the overvaluation argument, the appellant submitted information on four comparable sales that have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 4,680 to 4,800 square feet of land area. The comparables are class 2-03 properties that are improved with dwellings of wood or masonry exterior construction ranging in size from 1,032 to 1,250 square feet of living area. The dwellings are 70 to 96 years old. The comparables each have a full basement, two of which have finished area. Comparable #2 has central air conditioning. Each comparable has one or two fireplaces and a 1.5-car or a 2-car garage. The comparables sold from May 2018 to August 2019 for prices ranging from $23,000 to $43,800 or from $20.83 to $38.76 per square foot of living area, including land.

In support of the inequity argument, the appellant submitted information on seven comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-03 properties. According to the property characteristic printouts provided by the appellant, the comparables are improved with one-story dwellings or wood or wood and masonry exterior construction ranging in size from 1,066 to 1,242 square feet of living area. The dwellings are 71 to 99 years old. The comparables each have a full basement, one of which has finished area. Three comparables have central air conditioning, three comparables each have a fireplace and each comparable has a 1-car to a 2.5-car garage. The comparables have improvement assessments ranging from $3,655 to $5,118 or from $3.19 to $4.12 per square foot of living area.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to $3,387 which would reflect a total market value of $33,870 or $32.07 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 requested reduced improvement assessment of $1,749 would reflect an assessment of $1.66 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $6,713. The subject's assessment reflects a market value of $67,130 or $63.57 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 property has an improvement assessment of $5,075 or $4.81 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties that have the same assessment neighborhood code as the subject. Sales data was provided for comparable #2 and equity data was provided for each of the four comparables. The comparables each have a site containing 4,680 square feet of land area. The comparable are class 2-03 properties that are improved with one-story dwellings of frame exterior construction ranging in size from 1,056 to 1,144 square feet of living area. The dwellings are 68 to 98 years old. The comparables each have a full unfinished basement, one comparable has central air conditioning and each comparable has a 1.5-car or a 2-car garage. Comparable #2 sold in July 2021 for $130,000 or $123.11 per square foot of living area, including land. The four comparables have improvement assessments ranging from $5,099 to $5,577 or from $4.82 to $4.91 per square foot of living area.

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 parties submitted a total of five comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparable #3 which appears to be an outlier due to its considerably lower sale price of $23,000 or $20.83 per square foot of living area when compared to the other sales in the record. The Board has given less weight to the appellant's comparable sale #1 which has a sale date that occurred 31 months prior to January 1, 2021, less proximate to the assessment date at issue than the remaining comparables in the record. The Board has also given less weight to the appellant's comparables #2 and #3 which differ from the subject in age or dwelling size.

The Board finds on this limited record that the best evidence of market value is board of review comparable sale #2. The Board finds this comparable sold most proximate to the assessment date at issue and is most similar to the subject in location, dwelling size, design, age and features. This comparable sold in July 2021 for a price of $130,000 or $123.11 per square foot of living area, including land. The subject's assessment reflects a market value of $67,130 or $63.57 per square foot of living area, including land, which is considerably less than the best comparable sale in the record. Therefore, based on this record, the Board finds a reduction in the subject's assessment is not justified.

Additionally, the taxpayer contends assessment inequity as another 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 eleven equity comparables for the Board's consideration. The Board has given reduced weight to appellant's comparables #1, #2, #4, #6 and #7, as well as board of review comparable #1 which differ from the subject in dwelling size or age.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #5, along with board of review comparables #2, #3 and #4, which are similar to the subject in location, dwelling size, design, age and some features. The comparables have improvement assessments ranging from $4,045 to $5,275 or from $3.79 to $4.91 per square foot of living area.

The subject's improvement assessment of $5,075 or $4.81 per square foot of living area falls within the range established by the best comparables in this record. 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.

In conclusion, having examined the entire record, the Board finds that no change in the subject's assessment is warranted based either upon grounds of overvaluation or assessment inequity.

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:

C E R T I F I C A T I O N

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: July 16, 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

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