



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

APPELLANT: George Polymenakos
DOCKET NO.: 21-45133.001-R-1
PARCEL NO.: 20-27-410-027-0000

The parties of record before the Property Tax Appeal Board are George Polymenakos, 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 **A Reduction** 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: \$3,875
IMPR.: \$3,200
TOTAL: \$7,075

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 1-story dwelling of masonry exterior construction with 976 square feet of living area. The dwelling is approximately 108 years old. Features of the home include a basement and a fireplace. The property has a 3,100 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-02 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 parcels range in size from 3,100 to 4,216 square feet of land area and are improved with 1-story, class 2-02 homes of masonry, stucco, or wood exterior construction ranging in size from 865 to 979 square feet of living area. The dwellings range in age from 98 to

113 years old. Each home has a basement, one of which has finished area, a fireplace, and a 1-car or a 2-car garage. The comparables sold from January 2020 to February 2021 for prices ranging from \$30,000 to \$55,000 or from \$34.68 to \$63.29 per square foot of living area, including land.

The appellant also submitted information on eight equity comparables located within the same assessment neighborhood code as the subject. The comparables are improved with homes of masonry or wood exterior construction, six of which are 1-story homes and two of which are of undisclosed height, ranging in size from 840 to 990 square feet of living area. The dwellings range in age from 101 to 124 years old. Seven homes each have a basement, one of which has finished area, and one home has a concrete slab foundation. Five homes each have from a 1-car to a 2-car garage. The comparables have improvement assessments ranging from \$1,125 to \$3,188 or from \$1.22 to \$3.22 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 \$8,706. The subject has an improvement assessment of \$4,831 or \$4.95 per square foot of living area. The subject's assessment reflects a market value of \$87,060 or \$89.20 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%.

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. The parcels range in size from 3,100 to 3,720 square feet of land area and are improved with 1-story, class 2-02 homes of masonry exterior construction ranging in size from 672 to 980 square feet of living area. The dwellings range in age from 100 to 109 years old. Each home has a basement, one of which has finished area, and a 1-car or a 2-car garage. One home has central air conditioning. The comparables have improvement assessments ranging from \$3,850 to \$5,815 or from \$5.01 to \$6.29 per square foot of living area. The comparables sold from February to December 2021 for prices ranging from \$116,000 to \$240,000 or from \$172.62 to \$244.90 per square foot of living area, including land. Based on this evidence, the board of review requested the subject's assessment be sustained.

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.Adm.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.Adm.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment for overvaluation is not warranted.

The record contains a total of eight comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparable #3 and the board of review's comparable #3, due to substantial differences from the subject in dwelling size and/or basement finish. The Board

gives less weight to the appellant's comparable #4 and the board of review's comparable #2, which sold for considerably less or more than the other sales in this record, indicating these sales were outliers.

The Board finds the best evidence of market value to be the appellant's comparables #1 and #2 and the board of review's comparables #1 and #4, which sold proximate in time to the assessment date and are similar to the subject in dwelling size, age, location, and some features, although these comparables each have a garage that is not a feature of the subject, suggesting downward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables sold for prices ranging from \$55,000 to \$168,000 or from \$61.87 to \$181.82 per square foot of living area, including land. The subject's assessment reflects a market value of \$87,060 or \$89.20 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 for overvaluation 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.Adm.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.Adm.Code §1910.65(b). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains a total of twelve equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #3 and #5 through #8 and the board of review's comparables, due to substantial differences from the subject in design, dwelling size, foundation type, basement finish, and/or garage amenity.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2 and #4, which are similar to the subject in dwelling size, age, location, and features. These comparables have improvement assessments that range from \$2,540 to \$3,188 or from \$2.61 to \$3.22 per square foot of living area. The subject's improvement assessment of \$4,831 or \$4.95 per square foot of living area falls above the range established by the best comparables in this record and appears to be excessive. Based on this evidence, and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's improvement assessment is 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

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:

November 19, 2024



Clerk of the Property Tax Appeal Board

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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