



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

APPELLANT: Louis G. Paschos & Jim Grammas
DOCKET NO.: 21-49030.001-R-1
PARCEL NO.: 13-35-400-013-0000

The parties of record before the Property Tax Appeal Board are Louis G. Paschos & Jim Grammas, the appellants, 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: \$26,550
IMPR.: \$51,000
TOTAL: \$77,550

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 two improvements situated on one parcel.¹ Improvement #1 is described as a 3-story multi-family building of masonry exterior construction with 6,375 square feet of building area. The building was constructed in 1893 and is approximately 128 years old. Features of the building include a full unfinished basement and a 3.5-car garage. Improvement #2 is described as a 2-story multi-family building of masonry exterior construction with 1,949 square feet of building area. The building was constructed in 1893 and is approximately 128

¹ The board of review disclosed in the "Board of Review – Notes on Appeal" that there are two improvements on the property, both of which are class 2-11 buildings which were not disclosed or refuted by the appellant. For ease of reference, the Board has numbered the class 2-11 building with 6,375 square feet of building area as improvement #1 and the class 2-11 building with 1,949 square feet of building area as improvement #2. The appellant's grid analysis contained the description of the improvement #1. The board of review submitted property characteristic sheets on the subject property that contained descriptions of both improvements.

years old. Features of the building include a full unfinished basement and a 1-car garage. The property has an 8,850 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation and assessment inequity with respect to only Improvement #1 as the bases of the appeal. In support of the overvaluation argument the appellants submitted information on four comparable sales with the same assessment neighborhood code as the subject. The comparables are class 2-11 properties improved with 2-story multi-family buildings of wood or masonry exterior construction ranging in size from 5,370 to 6,836 square feet of building area. The buildings are 95 to 126 years old and have full basements, two of which are finished with apartments. Each building is reported to have a fireplace and three comparables each have a 2-car garage. The comparables sold from March 2019 to September 2021 for prices ranging from \$627,000 to \$850,000 or from \$99.75 to \$124.34 per square feet of building area.

In support of the inequity argument for Improvement #1, the appellants submitted information on six equity comparables with the same assessment neighborhood code as the subject. The comparables are class 2-11 properties improved with 2-story or 3-story or higher multi-family dwellings of wood or masonry exterior construction ranging in size from 4,827 to 6,866 square feet of building area. The buildings are 100 to 126 years old and have full basements that are finished with apartments. Four comparables each have a 2-car or a 3-car garage. The comparables have improvement assessments ranging from \$47,000 to \$69,000 or from \$6.17 to \$8.12 square feet of building area.

Based on the foregoing evidence the appellants requested a reduction in the subject's assessment.

The appellants submitted a copy of the subject's final decision from the Cook County Board of Review that disclosed a final total assessment of \$89,656. The appellants also disclosed the subject has an improvement assessment of \$63,106.

The board of review submitted its "Board of Review Notes on Appeal". The subject's assessment reflects a market value of \$896,560 or \$107.71 when using 8,394 square feet of combined building area, including land and the level of assessment of 10% for class 2 property under the Cook County Real Property Assessment Classification Ordinance. The board of review's evidence disclosed the subject's improvement #1 has a market value of \$545,062 and the subject's improvement #2 has a market value of \$86,002 for the 2021 tax year, excluding the land. Improvement #1 has an assessment of \$54,506 or \$8.55 per square foot of building area, which was not refuted by the appellants.

In support of its contention of the correct assessment the board of review submitted two grid analyses, each containing a parcel that is not the subject property and three comparables. The three comparable sales² are described as class 2-11 properties with sites ranging in size from 4,788 to 10,650 square feet of land area and are improved with 2-story buildings ranging in size from 6,176 to 7,249 square feet of building area. The buildings are 96 to 126 years old. Two comparables have full basements, one of which is finished with an apartment. One comparable

² Comparable #2 is the same sale as appellant's comparable #1.

has a slab foundation. Two comparables each have a 2-car garage. The comparables sold in September and November 2021 for prices ranging from \$833,291 to \$875,000 or from \$114.95 to \$141.68 per square foot of building area, including land.

The three equity comparables³ are class 2-11 properties that are improved with 3-story buildings of masonry exterior construction ranging in size from 5,432 to 7,194 square feet of building area. The buildings are 99 to 118 years old and have full basements, two of which are finished with apartments. Comparable #2 has central air conditioning. Comparable #1 has a 2-car garage. The comparables have improvement assessments ranging from \$51,658 to \$94,026 or from \$8.12 to \$13.07 per square foot of building area.

Based on the foregoing evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend in part 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 Board finds the appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

Initially, the Board finds the appellants is only requesting a reduction in the improvement assessment for Improvement #1.

For Improvement #1, the parties submitted eight comparables for the Board's consideration, one of which is common to both parties. The Board gives less weight to appellants' comparables #2, #3, #5 and #6 as well as board of review comparables #1 and #2 which are less similar to the subject in building size.

The Board finds the best evidence of assessment equity to be the parties' common comparable and appellants' comparable #4 which are most similar in building size with varying degrees of similarity in age and features when compared to the subject. The Board recognizes adjustments are necessary to these comparables for differences from the subject in age, finished basement area and garages. The properties have improvement assessments ranging of \$41,660 and \$55,725 or \$6.99 and \$8.12 per square foot of building area. Improvement #1 has an improvement assessment of \$54,506 or \$8.55 per square foot of building area which is bracketed by the best comparables in this record on an overall market value basis but falls above on a price per square foot basis. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds that the subject's Improvement #1 was inequitably assessed and a reduction in the subject's assessment is justified.

³ Comparable #3 is the same property as appellant's equity comparable #1.

The appellants also contend 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 six comparable sales for the Board's consideration, one of which is common to both parties. The Board gives less weight to appellants' comparables #2 and #3, which sold in 2019, less proximate in time to the January 1, 2021, assessment date than the other comparables in the record. The Board gives less weight to appellants' comparable #4 which lacks a garage that is a subject feature. The Board finds the best evidence of market value is appellant's comparable #1 and the board of review comparables which includes the common comparable. These comparables sold in September or November of 2021 for prices ranging from \$833,291 to \$875,000 or from \$114.95 to \$141.68 per square foot of living area, including land. The Board finds the subject's assessment after reduction due to assessment inequity, reflects a market value of \$775,500 or \$93.16 per square foot of living area, including land which is below the market value of the best comparable sales in the record. Therefore, no further reduction is warranted on this basis.

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: _____

February 18, 2025



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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