

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Paraskevas Kaloudis

DOCKET NO.: 22-37715.001-R-1 through 22-37715.003-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Paraskevas Kaloudis, 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 <u>no change</u> 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:

DOCKET NO	PARCEL NUMBER	LAND	<b>IMPRVMT</b>	TOTAL
22-37715.001-R-1	12-21-303-021-0000	2,790	8,405	\$11,195
22-37715.002-R-1	12-21-303-022-0000	2,790	8,405	\$11,195
22-37715.003-R-1	12-21-303-064-0000	1,395	0	\$1,395

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 2022 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 three parcels that are improved with a one-story dwelling of frame exterior construction with 870 square feet of living area. The dwelling is approximately 69 years old. Features of the dwelling include a partial unfinished basement, one full bathroom, central air conditioning and a 2.5-car garage. The property has a 7,750 square foot site and is located in Franklin Park, Leyden 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables have sites that range in size from 5,208 to 8,334 square feet of land area. The comparables are improved

with one-story dwellings of frame or frame and masonry exterior construction ranging in size from 748 to 988 square feet of living area. The dwellings are from 73 to 100 years old. The comparables each have a full or partial unfinished basement, one bathroom and a 1.5-car garage. Comparable #4 has central air conditioning. The properties sold from December 2019 to January 2022 for prices ranging from \$117,000 to \$157,000 or from \$134.48 to \$186.02 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$14,627, reflecting a market value of \$146,270 or \$168.13 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 board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the Cook County Board of Review decision for the 2022 tax year disclosing the combined total assessment for the subject's three parcels of \$23,785. The subject's assessment reflects a market value of \$237,850 or \$273.39 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 three comparable properties, since board of review comparable #1 is one of the subject parcels. The three comparables each have the same assessment neighborhood code and property classification code as the subject. The comparables are located approximately ¼ of a mile from the subject property and have sites that contain either 4,650 or 4,960 square feet of land area. The comparables are improved with one-story dwellings of masonry exterior construction ranging in size from 870 to 950 square feet of living area. The dwellings are from 66 to 68 years old. One comparable has a crawl space foundation and two comparables each have a full unfinished basement. Each comparable has one full bathroom and a two-car garage. Comparable #2 has central air conditioning. The comparables sold from November 2019 to April 2023 for prices ranging from \$225,100 to \$235,000 or for \$247.37 and \$264.37 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

#### **Conclusion of Law**

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

The record contains seven comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables #2 and #4, as well as board of review comparables #2

<sup>&</sup>lt;sup>1</sup> Sales data for board of review comparable #3 is found in the supplemental spreadsheet provided by the board of review.

and #4, due to their sale dates occurring from 15 to 25 months prior to or 16 months after the January 1, 2022, assessment date, in either 2019, 2020 or 2023, less proximate in time to the lien date at issue than other comparable sales in the record. The Board has also given less weight to the appellant's comparable #3 due to its significantly older dwelling age, when compared to the subject dwelling.

The Board finds the best evidence of market value to be the appellant's comparable #1 and board of review comparable #3, which sold more proximate in time to the assessment date at issue. These two comparables have the same assessment neighborhood code and property classification code as the subject. The comparables are similar to the subject dwelling in size, design and age. However, each comparable lacks central air conditioning and has a smaller garage capacity, when compared to the subject, suggesting upward adjustments for these differences would be necessary in order to make the comparables more equivalent to the subject. Nevertheless, the comparables sold in November 2021 and September 2022 for prices of \$155,000 and \$230,000 or \$156.88 and \$264.37 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$237,850 or \$273.39 per square foot of living area, including land, which is greater than the two best comparable sales in record but appears to be logical given the subject's superior features. Therefore, based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not warranted based on overvaluation.

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.

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Member	Member
Dan Dikini	Sarah Bokley
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:	August 19, 2025		
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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 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**

Paraskevas Kaloudis, by attorney: George N. Reveliotis Reveliotis Law, P.C. 1030 Higgins Road Suite 101 Park Ridge, IL 60068

# **COUNTY**

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