



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

APPELLANT: Samuel Tsamoulos  
DOCKET NO.: 23-05641.001-R-1  
PARCEL NO.: 05-12-300-014

The parties of record before the Property Tax Appeal Board are Samuel Tsamoulos, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. in Chicago; and the DuPage 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 **DuPage** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$95,870  
**IMPR.:** \$337,650  
**TOTAL:** \$433,520

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the DuPage County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2023 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 2-story dwelling of masonry exterior construction with 6,092 square feet of living area.<sup>1</sup> The dwelling was built in 2006. Features of the home include a basement with finished area, central air conditioning, three fireplaces, and a garage with 740 square feet of building area. The property has an approximately 19,476 square foot site and is located in Glen Ellyn, Milton Township, Lake County.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted evidence disclosing the subject property was purchased on March 26, 2021 for a price of \$1,200,000. The appellant completed Section IV – Recent Sale Data disclosing the transaction was not between family members or related corporations, that the subject was sold by

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<sup>1</sup> The only description of the subject property was gleaned from the grid analysis presented by the board of review, which was unrefuted by the appellant.

Cartus Financial Corporation, and had been advertised in the Multiple Listing Service (MLS) for an unspecified amount of time using realtor, Ed Sweeney, Broker, of Coldwell Banker, The Real Estate Group. The appellant also submitted copies of the settlement statement, PTAX-203 Real Estate Transfer Declaration, and other supporting documentation which reiterated the sale price and sale date, that the subject was advertised for sale, and commissions were paid to two entities. Based on this evidence, the appellant requested the subject's assessment be reduced to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$433,520. The subject's assessment reflects a market value of \$1,300,690 or \$213.51 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>2</sup>

Additional evidence referenced by the board of review, as being submitted into evidence, included a copy of its grid analysis and property record cards for its suggested comparables (Exhibit I), as well as an Assessment Data Sheet, the subject's property record card, and a map depicting the location of the parties' comparables in relation to the subject (Exhibit II). However, the Board was unable to find the subject's property record card in the evidence submitted. The board of review noted the market price per square foot range for its comparables and illustrated that the subject's assessment as reflected by its estimated market value fell below this range. Further, the board of review asserted that the subject "got his sale price plus the 2022 & 2023 equalization factors" applied to Milton Township with the increase for 2023 resulting from the application of the 2023 equalization factor for Milton Township of 1.0581% being applied to the 2022 stipulation agreement.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located within 0.28 of a mile from the subject property, none of which are located in the subject's assessment neighborhood code. The comparables have sites that range in size from 15,371 to 33,229 square feet of land area. The comparables are improved with 2-story dwellings of frame, masonry, or frame and masonry exterior construction ranging in size from 5,730 to 6,163 square feet of living area. The homes were built from 1994 to 2003. Each comparable has a basement with finished area, central air conditioning, from two to four fireplaces, and a garage that ranges in size from 784 to 951 square feet of building area. The properties sold from April 2021 to May 2023 for prices ranging from \$1,725,000 to \$1,900,000 or from \$288.82 to \$312.45 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

### **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

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<sup>2</sup> Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2023.

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 appellant submitted evidence of an arm's length sale of the subject property and the board of review submitted three comparable sales for the Board's consideration. The Board gives little weight to the subject's sale and board of review comparable sale #1 which occurred in March and April 2021, almost 22 and 21 months, respectively, prior to the subject's January 1, 2023 assessment date at issue, and thus occurred less proximate in time to the subject's assessment date than the remaining two board of review's comparables.

The Board finds the best evidence of market value in the record to be the sales for board of review comparable #2 and #3. These comparables each sold within six months of the assessment date at issue, thus selling more proximate in time to the subject's lien date and thus being more reflective of the subject's market value on its assessment date. The comparables are relatively similar to the subject in location, design, age, dwelling size, and other features. These two properties sold for prices of \$1,780,000 and \$1,900,000 or \$288.82 and \$312.45 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$1,300,690 or \$213.51 per square foot of living area, land included, which falls below the two best comparable sales in this record. Based on this record and after considering adjustments to the comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and a reduction in the subject's assessment is not warranted.

Further, the Board finds the 2023 assessment of \$433,520 reflects the 2022 stipulation amount of \$409,720 after application of the 2023 equalization factor for Milton County of 1.0581% ( $\$409,720 \times 1.0581 = \$433,520$  rounded).

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: \_\_\_\_\_

January 21, 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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