



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

APPELLANT: Peter Limperis  
DOCKET NO.: 23-22388.001-R-1  
PARCEL NO.: 27-14-401-021-1036

The parties of record before the Property Tax Appeal Board are Peter Limperis, the appellant(s), by attorney George J. Relias, of Relias Law Group, Ltd. in Chicago; 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:** \$2,487  
**IMPR.:** \$26,567  
**TOTAL:** \$29,054

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 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 condominium unit in a 34-year-old condominium complex. The property has a 196,662 square foot site and is located in Orland Park, Orland Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence of comparable sales of six condominium units in the same complex which took place from April 2022 to February 2023 for sales prices from \$187,000 to \$242,000. These units comprised an 8.46% ownership interest in the complex. The total value of the units sold was \$1,288,900 which reflects an imputed value of the complex of \$15,241,350. Appellant asserted that there should be a 1% discount for personal property. Appellant further argued that the ownership percentage of the subject property unit is 1.28% with no further explanation or

evidence. Based on this evidence the appellant requested a reduction in the subject's total assessment to \$19,338.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$29,054. The subject's assessment reflects a market value of \$290,540 using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on 14 condominium sales in the same complex as the subject property, including those submitted by the appellant, which took place from May 2020 to June 2023 for sales prices from \$150,000 to \$242,000. These 14 units comprised an ownership interest in the complex of 19.6392%. The total consideration for these sales was \$2,842,900. Based on these amounts the total value of the complex was \$14,475,640. The board of review indicated that the ownership interest of the subject unit was 2.0234% of the complex and submitted a condominium analysis which included the percentage of ownership for all the units within the building. 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 appellant contended overvaluation in the assessment process. The parties each submitted a condominium sales analysis which was intended to show the market value of the subject unit based on the sales of other units in the complex and their percentage of ownership interest in the complex. The Board gives no weight to the appellant's argument for a 1% deduction for personal property as there is no evidence to support this. Further, the appellant asserted that the ownership interest of the subject unit was 1.28%. The Board gives no weight to the appellant contention of ownership interest as there is no evidence to support this. The board of review submitted that the ownership interest of the subject unit was 2.0234% and provided an information sheet which showed the ownership interest of each unit in the complex. The Board finds that the ownership interest of the subject unit is 2.0234%. Dividing the total sale price of the units sold by the percentage of ownership of those units of 19.6392% arrives at a value for the building of \$14,475,640. Applying the subject's percentage of ownership to this value reflects a value for the subject of \$292,900. The Board finds the appellant failed to show by a preponderance of the evidence that the subject property was overvalued, and a reduction is not 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

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:

May 19, 2026



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

AGENCY

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