



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

APPELLANT: Samuel Tsamoulos  
DOCKET NO.: 24-04091.001-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:** \$104,153  
**IMPR.:** \$366,823  
**TOTAL:** \$470,976

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 2024 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 two-story dwelling of masonry exterior construction with 6,092 square feet of living area. The dwelling was constructed in 2006 and is approximately 18 years old. Features of the home include a basement with 2,800 square feet of finished area, 6½ bathrooms, central air conditioning, three fireplaces, and a 740 square foot garage. The property has a 19,476 square foot site and is located in Glen Ellyn, Milton Township, DuPage County.

The appellant's appeal is based on overvaluation. In support of the argument, the appellant completed Section IV – Recent Sale Data of the Residential Appeal petition reporting the subject property was purchased on March 5, 2021 for a price of \$1,200,000. The appellant further reported the property was purchased from Cartus Financial Corporation, the parties to the transaction were not related, and a Realtor assisted in the sale of the property. The property was advertised in the Multiple Listing Service (MLS) from January 14, 2021 to March 26, 2021. A

copy of the Warranty Deed and Purchase Contract were submitted which reiterates the purchase price and anticipated closing date along with other documentation. A copy of the Settlement Statement reiterates the sale price and reports a settlement date of March 26, 2021. The appellant also reported the sale was not caused by a foreclosure action and did not involve the use of a contract for deed.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price at the statutory level of assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$470,976. The subject's assessment reflects a market value of \$1,413,069 or \$231.95 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.<sup>1</sup>

In a memorandum, the board of review reported a stipulation was established in 2022 reducing the assessed valuation to the purchase price. Since that time, increases in the assessment have occurred due to the Milton Township equalization factors. In addition, the memorandum notes the sale involved Cartus Financial, a relocation company, which purchased the property in 2019 for \$1,553,000. Based upon area sales, the subject's estimated market value is at the lower end of the range in the neighborhood.

In support of its contention of the correct assessment, the board of review submitted information on six comparable sales located in the same or similarly identified neighborhood code as the subject and within .75 of a mile from the subject. The comparable parcels range in size from 11,260 to 43,425 square feet of land area and are each improved with a 2-story or 2.5-story dwelling of frame or masonry exterior construction. The homes were built from 1993 to 2017 and range in age from 7 to 31 years old. The dwellings range in size from 5,060 to 6,163 square feet of living area. Each comparable has a basement, with four comparables having finished basement areas ranging from 1,090 to 2,829 square feet. Features include 4 to 6 full bathrooms, five dwellings have 1 or 2 half-baths, central air conditioning, one to three fireplaces, and a garage ranging in size from 708 to 966 square feet of building area. The comparables sold from March 2022 to January 2025 for prices ranging from \$1,575,000 to \$2,000,000 or from \$288.82 to \$438.30 per square foot of living area, including land. 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

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<sup>1</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 issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

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 reported the March 2021 purchase price of the subject, and the board of review submitted six suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the March 2021 purchase price of the subject which occurred approximately 33 months prior to the lien date of January 1, 2024, whereas the record contains other properties which sold more proximate in time to the lien date. The Board has given reduced weight to board of review comparables #1 and #2, which although they sold more proximate to the lien date, consist of dwellings that are 7 and 31 years old as compared to the 18 year old subject dwelling. In addition, reduced weight has been given to board of review comparable #4, which sold approximately 12 months after the lien date at issue and would not have been considered in arriving at the subject's assessment for tax year 2024.

The Board finds the best evidence of market value in the record to be comparable sales #3, #5 and #6 submitted by the board of review. These comparables were similar to the subject in location, style, some features, and bracket the subject in age. Adjustments to these comparables are necessary for age, lot size, exterior construction, bathroom count, dwelling size, basement size, finished basement area, and/or fireplace count to make them more equivalent to the subject. These properties also sold proximate in time to the assessment date at issue. The comparables sold in 2023 and 2024 for prices ranging from \$1,575,000 to \$1,900,000 or from \$288.82 to \$362.94 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,413,069 or \$231.95 per square foot of living area, including land, which is below the best comparable sales in this record.

Based on this record and after considering necessary adjustments to the best comparable sales in the record to make the properties more equivalent to the subject, the Board finds a reduction in the subject's assessment 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: \_\_\_\_\_

December 23, 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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