



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

APPELLANT: John Toumplis
DOCKET NO.: 19-50085.001-C-1 through 19-50085.002-C-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are John Toumplis, the appellant(s), 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
19-50085.001-C-1	13-28-100-014-0000	14,175	32,075	\$ 46,250
19-50085.002-C-1	13-28-100-015-0000	14,175	32,075	\$ 46,250

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) after receiving a decision from the Cook County Board of Review. The instant appeal challenges the assessment for tax year 2019. The Property Tax Appeal Board (the "Board") finds that it has jurisdiction over the parties and the subject matter of this appeal.

Findings of Fact

The subject consists of a one-story commercial building of masonry construction with 5,250 square feet of building area. The building is 39 years old. The property's site is 6,300 square feet, and it is located in Jefferson Township, Cook County. The subject is classified as a class 5-17 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 an appraisal estimating the subject property had a market value of \$370,000 as of January 1, 2019. The number of days that sale comparables #1, #3, #6, and #7 were each listed for sale on the open market is listed as "N/A." Sale comparable #2 was listed as a "distress sale," sale comparable #5 was listed as a short sale, and sale comparable #8 was listed as an REO sale. The appraisal states that all three of these comparables were adjusted upwards 10.00% for conditions of sale. When describing the improvements, the appraisal states, in part:

On February 28, 2018 there was a fire in unit 3129 (the current photography studio). The interior of that unit was renovated. The restaurant unit suffered from heavy smoke damage. The owner noted that, due to the fire, a new roof, electrical system and new roof-top airconditioning [sic] units were needed. The restaurant, the owner reported, reopened in January 2019.

The appraisal further states that the subject was built in 1979 and that its remaining useful life was ten years. Sale comparable #1 was built in 1970 and was not adjusted for age. Sale comparable #5 was built in 2007 and was adjusted downward 5.00% for year built. The remaining six sale comparables were built between 1915 and 1957 and were each adjusted upward 5.00% for year built. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$92,500.

The board of review submitted its "Board of Review Notes on Appeal" disclosing that the total assessment for the subject is \$105,000. The subject's assessment reflects a market value of \$420,000 when applying the 2019 statutory level of assessment for class 5 property of 25.00% under the Cook County Real Property Assessment Classification Ordinance.

The board of review did not submit any evidence in support of the subject's current assessment.

At hearing, the appellant called Shawn Schneider to testify. After *voir dire*, the Board accepted Mr. Schneider as an expert in real estate valuation for properties such as the subject without objection from the board of review.¹ Mr Schneider testified that he completed the appraisal previously submitted by the appellant, that he inspected the subject property, and that he utilized the income capitalization approach and the sales comparison approach in concluding that the subject's market value as of January 1, 2019 was \$370,000.

During cross examination, Mr. Schneider testified that the days on the market for sale comparables #1, #3, #6, and #7 were listed as "N/A" because he was unable to determine this information, but the witness added that he verified that the sales were at arm's-length by looking at the CoStar listing, and the records of the Cook County Assessor and the Cook County Recorder of Deeds. Mr. Schneider then testified that the 10.00% upward adjustments made for sale conditions to sale comparables #2, #5, and #8 were all based on his knowledge and experience in appraising properties.

Mr. Schneider testified that the repairs made to the subject after the fire were replacements, and that replacing these components does not affect a property's remaining useful life. The expert witness further opined that the subject's remaining useful life was not relevant to his analysis as he did not complete a cost approach to value for his report. Mr. Schneider testified that he utilized the year build of the sale comparables in his analysis, and, even after the repairs and replacements made after the fire, he would not utilize the effective age when doing his adjustments to the sale comparables.

¹ *Voir dire* was conducted during the hearing for docket number 19-49921, which was conducted earlier on the same day as the hearing for the instant appeal.

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 proven 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 meet this burden of proof, and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appraiser credibly testified at the hearing regarding the appraisal. The board of review analyst asked several questions of the appraiser during cross examination regarding various decisions and inputs that went into preparing the appraisal, and the appraiser competently testified as to each of these factors. Moreover, the board of review did not submit any evidence to rebut or challenge any portion of the appraisal. The Board finds the subject property had a market value of \$370,000 as of the assessment date at issue. Therefore, based on this record, the Board finds the appellant has proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment is warranted. Since market value has been established, the 2019 statutory level of assessment for class 5 property under the Cook County Real Property Assessment Classification Ordinance of 25.00% shall apply.

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 20, 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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