



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

APPELLANT: Sam Theofanopoulos & TNT Property Management  
DOCKET NO.: 19-55862.001-R-1  
PARCEL NO.: 32-29-207-034-0000

The parties of record before the Property Tax Appeal Board are Sam Theofanopoulos & TNT Property Management, the appellants, by Jessica Hill-Magiera, Attorney at Law, in Lake Zurich, 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:

**LAND:** \$2,700  
**IMPR.:** \$4,140  
**TOTAL:** \$6,840

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants timely filed the appeal from a tax year 2018 Final Administrative Decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) in order to challenge the assessment for the 2019 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 with 1,836 square feet of living area of frame exterior construction. The dwelling was constructed in 1900 and is approximately 119 years old. Features of the home include a full unfinished basement and a two-car garage containing 484 square feet of building area. The property has a 9,000 square foot site and is located in Chicago Heights, Bloom Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted information on five comparable sales located in the same neighborhood code as is assigned to the subject and within .70 of a mile from the subject. The parcels range in size from 4,250 to 10,000 square feet of land area and are each improved with a Class 2-05 two-story dwelling of frame, masonry or frame and masonry exterior construction. The homes range

in age from 97 to 115 years old and range in size from 1,632 to 1,852 square feet of living area. Features include full basements, where comparables #3 and #4 have finished area. Comparable #1 has central air conditioning and three comparables each have a fireplace. Each comparable has either a 2-car or a 2.5-car garage containing either 484 or 605 square feet of building area. The comparables sold from January to December 2018 for prices ranging from \$5,000 to \$61,900 or from \$2.70 to \$36.33 per square foot of living area, including land. Based on this evidence, the appellant requested a reduced total assessment of \$3,375.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$7,607. The subject's assessment reflects a market value of \$76,070 or \$41.43 per square foot of living area, including land, when applying the level of assessment for Class 2-05 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In response to the appeal, the board of review noted that the appellants are requesting a total assessment below the stipulation the parties entered into for tax year 2018. In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the same neighborhood code as is assigned to the subject and where comparable #1 is in the same block as the subject. The parcels range in size from 4,999 to 7,500 square feet of land area and are each improved with either a Class 2-04 or a Class 2-05 1.5-story or 2-story dwelling of frame or frame and masonry exterior construction. The homes range in age from 104 to 119 years old and range in size from 1,696 to 2,088 square feet of living area. Features include full unfinished basements and three comparables have either a one-car or a two-car garage. The comparables sold from June 2018 to August 2019 for prices ranging from \$68,000 or \$79,619 or from \$34.45 to \$45.59 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellants through counsel asserted the board of review comparables are each dissimilar to the subject in either design or lack of a garage amenity along with generally challenging that board of review comparable #2 was sold as reported. The appellants further argued that their own comparables #1, #2 and #3 were the best comparables in the record supporting an amended total reduction request of \$4,500.

### **Conclusion of Law**

The appellants contend 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 appellants met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of nine comparable sales located in close proximity to the subject with varying degrees of similarity in design, age, dwelling size and some features to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellants' comparable #1 as this sale price of \$5,000 appears to be an outlier given the other sales in the record presented by both parties. The Board afforded less weight to appellants'

comparables #3 and #4 due to their finished basements, not a feature of the subject. The Board has also given reduced weight to appellants' comparable #5 as well as board of review comparable #1 due to differing dwelling sizes and/or lack of a garage amenity which is a feature of the subject.

The Board finds the best evidence of market value to be appellants' comparable sale #2 along with board of review comparables #2, #3 and #4 where the Board recognizes that adjustments to these comparables are necessary to make the properties more equivalent to the subject for differences in size and/or garage size. These four comparables sold for prices ranging from \$61,900 to \$79,619 or from \$36.33 to \$40.62 per square foot of living area, including land. The subject's assessment reflects a market value of \$76,070 or \$41.43 per square foot of living area, including land, which is within the range established by the best comparable sales in this record in terms of overall value although it is above the range of the best comparables on a per-square-foot basis. Based on this evidence and after considering appropriate adjustments to the best comparables to make them more equivalent to the subject in various characteristics, the Board finds a reduction in the subject's assessment is 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 21, 2024



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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Sam Theofanopoulos & TNT Property Management, by attorney:  
Jessica Hill-Magiera  
Attorney at Law  
790 Harvest Drive  
Lake Zurich, IL 60047

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602