



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

APPELLANT: THEODORE PAPOUGA
DOCKET NO.: 22-34597.001-R-1
PARCEL NO.: 02-35-307-008-0000

The parties of record before the Property Tax Appeal Board are THEODORE PAPOUGA, the appellant(s), by attorney John W. Zapala, of the Law Offices of John Zapala, P.C. 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 **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: \$11,548
IMPR.: \$21,692
TOTAL: \$33,240

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 2022 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 one-story dwelling with 1,842 square feet of living area of masonry construction. The dwelling was 56 years old. Features of the home include a full basement, central air conditioning, a fireplace, and a two-car garage. The property has a 20,996 square foot site and is located in Palatine, Palatine Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity as the basis of the appeal. In support of the argument of overvaluation the appellant submitted information on four comparable sales properties which sold from February 2021 to June 2022 for sales prices from \$285,000 to \$415,000 or from \$101.32 to \$206.77 per square foot of living area, land included in the sales prices. These properties were located within a 0.66-mile radius of the subject. The

improvements were from 49 to 67 years old and had from 1,862 to 2,820 square feet of living area.

In support of their contention of assessment inequity the appellant submitted information on five class 2-04 equity comparable properties with varying degrees of similarity to the subject which are located within a 0.73-mile radius of the subject. The improvements ranged: in age from 53 to 65 years; in size from 2,065 to 2,307 square feet of living area; and in improvement assessment from \$11.67 to \$12.41 per square foot of living area. Based on this evidence the appellant is seeking a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$38,294. The record included the board of review decision letter which indicates a total assessment of \$38,293 and the Board relies on that decision. The subject's assessment reflects a market value of \$382,930 or \$207.89 per square foot of living area, including land, when applying the level of assessment for class two property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on one comparable sale property which is also a comparable sale property that the appellant suggested. This property sold in April 2021 for \$385,000 or for \$206.77 per square foot of living area, and included in the sale price. This property was located within a ¼-mile of the subject, was 64 years old, and had 1,862 square feet of living area.

In support of its contention of the equitable assessment of the subject the board of review submitted four class 2-04 equity comparable properties with varying degrees of similarity to the subject which are located within a ¼-mile radius of the subject. The improvements ranged: in age from 47 to 64 years; in size from 1,853 to 2,062 square feet of living area; and in improvement assessment from \$15.43 to \$15.67 per square foot of living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

This matter was scheduled to proceed to hearing. Prior to the hearing, the parties submitted a written request to waive the hearing and have the matter decided based on the evidence previously submitted. The administrative law judge granted the parties' request.

Conclusion of Law

The appellant contends, in part, that 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 met 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 appellant's comparable sales #1 through #4 and board of review's only comparable sale, #4. Appellant's comparable sale #3 and board of review's comparable sale #4 are the same property. These comparables sold for prices

ranging from \$101.32 to \$206.77 per square foot of living area, including land. The subject's assessment reflects a market value of \$207.89 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. Based on this evidence the Board finds a reduction in the subject's assessment is justified. After this reduction the Board finds that the subject property is equitably assessed.

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: _____

September 15, 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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