FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jefferson Offutt
DOCKET NO.: 22-40871.001-R-1
PARCEL NO.: 17-06-112-021-0000

The parties of record before the Property Tax Appeal Board are Jefferson Offutt, the appellant(s), by attorney Andreas Mamalakis, of the Law Offices of Andreas Mamalakis in Kenosha; 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:	$33,696
IMPR.:	$44,404
TOTAL:	$78,100

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 two-story, multi-unit dwelling of masonry construction with 1,980 square feet of living area. The dwelling is approximately 126 years old. Features of the property include a full basement and a two-car garage. The property has a 4,212 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based, in part, on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on October 14, 2021, for a price of $781,000 or $394.44 per square foot of living area, including land. The evidence of sale consisted of a copy of a settlement statement and appellant’s answers to Section IV – Recent Sale Data of their appeal. This evidence indicated, among other things, that the sale was sold through a realtor, advertised for sale through a multiple listing service, and that the subject’s sale was not between family members or related corporations. Appellant indicated that the property was advertised for approximately one month. Appellant indicated that the sale was not due to a foreclosure proceeding and that a contract for deed was not utilized. The settlement statement disclosed that the sale price was $781,000.

The appellant also contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on five suggested class 2-11 equity comparable properties with varying degrees of similarity to the subject. The suggested comparable properties range in size from 2,179 to 2,244 square feet of living area and range in age from 127 to 138 years old. The appellant reported that the suggested comparable properties shared the same neighborhood code as the subject and were within a quarter mile of the subject property. The comparable properties have improvement assessments ranging from $18.10 to $22.40 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's total assessment to $74,147.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $90,977. The subject's assessment reflects a market value of $909,770 or $459.48 per square foot of living area, including land, when applying the Cook County Real Property Assessment Classification Ordinance of 10%. The subject property has an improvement assessment of $57,281 or $28.93 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four suggested equity comparable properties and acknowledged that the property sold in October 2021 for $781,000. The suggested four equity comparables consisted of masonry constructed dwellings that are located within a quarter mile of the subject. The suggested comparable properties range in size from 3,022 to 3,637 square feet of living area and range in age from 123 to 138 years old. The board of review's comparable properties had improvement assessments that ranged from $28.93 to $35.22 per square foot of living area. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Illinois Supreme Court defined fair cash value as what the property would bring at a voluntary sale where the owner is ready, willing, and able to sell but not compelled to do so, and the buyer is ready, willing, and able to buy but not forced to do so. *Springfield Marine Bank v. Property Tax Appeal Board*, 44 Ill.2d. 428 (1970). In addition, Section 1-50 of the Property Tax Code defines fair cash value as:

> The amount for which a property can be sold in the due course of business and trade, not under duress, between a willing buyer and a willing seller. (35 ILCS

200/1-50)

The Board finds the best evidence of market value to be the sale of the subject property in October 2021 for a price of $781,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, the property had been advertised on the open market with the Multiple Listing Service. In further support of the transaction the appellant submitted a copy of the settlement statement. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value. Based on this record the Board finds the subject property had a market value of $781,000 as of January 1, 2022, and that a reduction in the subject’s assessment is justified. Since market value has been determined, the 10.00% level of assessment for Class 2 property under the Cook County Property Assessment Classification Ordinance shall apply. As to the appellant’s inequity argument, the Board finds that after the reduction based on the recent sale of the subject property, the subject property is now 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: ________________ ________________

C E R T I F I C A T I O N

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

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