



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

APPELLANT: Sandra Christou
DOCKET NO.: 23-36500.001-R-1 through 23-36500.004-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Sandra Christou, the appellant(s), by attorney William I. Sandrick, of Sandrick Law Firm, LLC in Homewood; 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
23-36500.001-R-1	28-11-300-012-0000	1,155	12,095	\$13,250
23-36500.002-R-1	28-11-300-013-0000	1,155	95	\$1,250
23-36500.003-R-1	28-11-300-014-0000	1,155	95	\$1,250
23-36500.004-R-1	28-11-300-015-0000	1,155	95	\$1,250

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 2023 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, and partially one-story, mixed-use building with a commercial space and a residential apartment of masonry construction with 3,150 square feet of building area. The dwelling was 68 years old. The property has a 3,300 square foot site and is located in Midlothian, Bremen Township, Cook County. The property is a class 2-12 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 \$170,000 as of January 1, 2023. The appraisal was prepared by a certified general real estate appraiser who conducted an inspection of the property on September 21, 2023. The appraiser asserted

that the highest and best use of the property as improved was its current use. Appellant disclosed that this is an owner-occupied residence. The appraiser used the income capitalization approach and the sales comparison approach to valuation.

Under the income capitalization approach, the appraiser analyzed six comparable rentals for the residential apartment on the property and six comparable commercial leased properties for the commercial unit located on the property. All of these comparables were located an undisclosed distance from the subject property. Considering the data from the apartment rental comparable properties, the appraiser estimated an average rent of \$1,300 per month or \$15,600 annually. Considering the data from the commercial space, the appraiser estimated an average annual income of \$16,500. This results in potential gross income (PGI) of \$32,100. The appraiser stabilized the vacancy rate at 12.0% for an effective gross income (EGI) of \$28,248. Expenses were then deducted to arrive at a net operating income (NOI) of \$21,468. Next, the appraiser calculated the overall capitalization rate of 8%. Adding the tax load for the vacancy rate, the appraiser arrived at the final capitalization rate of 12.4%. Dividing the NOI of \$21,468 by the capitalization rate of 12.4%, the appraiser arrived at a value under the income approach of \$175,000, rounded.

Under the sales comparison approach, the appraiser utilized five comparable sales located within an undisclosed distance to the subject. The comparable properties ranged in size from 5,000 to 6,930 square feet of building area. The properties were each improved with a mixed-use building of masonry construction. The comparable properties sold from October 2020 to May 2023 for prices ranging from \$254,200 to \$350,000 or from \$48.88 to \$55.79 per square foot of building area, land included. The appraiser adjusted, if applicable, for location, size, land-to-building ratio, and condition. The appraiser concluded that based on the sales data and applying adjustments to the comparable sales for differences from the subject, the subject had a market value of \$165,000, rounded.

In reconciling the two approaches to value, the appraiser gave equal considerable weight to the income capitalization approach and the sales comparison approach to valuation and found that both were reliable. Therefore, the appraiser arrived at the final opinion of value for the subject property of \$170,000 as of January 1, 2023.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$21,000. The subject's assessment reflects a market value of \$210,000 or \$66.67 per square foot of living area, including land, when applying the level of assessments for class 2 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 four comparable sales properties: one located within a ¼-mile of the subject; one located within the same subarea as the subject; and two located in different neighborhood codes than the subject with no proximity disclosed. These properties sold from June 2021 to May 2023 for sales prices from \$215,507 to \$1,120,541 or from \$33.72 to \$235.75 per square foot of living area, land included. These property's improvements were from 55 to 77 years old and had from 3,644 to 6,391 square feet of building 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 Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appellant submitted what appears to be a credible appraisal report with reasonable and logical adjustments for differences from the subject which was not challenged by the board of review. The four comparable sales presented by the board of review lacked adjustments for significant differences when compared to the subject property. The subject's current assessment reflects a market value of \$210,000, which is higher than the appraised value. Based on the evidence presented, the Board finds the subject property is overvalued and a reduction commensurate with the appellant's request is warranted. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance shall apply. (86 Ill.Admin.Code §1910.50(c)(2)).

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 19, 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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