



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

APPELLANT: Joseph Magnelli
DOCKET NO.: 23-44359.001-R-1
PARCEL NO.: 09-25-322-057-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Joseph Magnelli, the appellant, 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, PTAB hereby finds **A Reduction** in the Cook County Board of Review's assessment of the property is justified. The correct assessed valuation of the property is:

LAND: \$7,468
IMPR.: \$21,632
TOTAL: \$29,100

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision 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 1,127 square feet, one-story masonry structure on a 3,934 square feet parcel in Chicago, Jefferson Township, Cook County. The 64-year-old, non-owner-occupied residence contained one bathroom, no central air conditioning, a two-car garage, and a full basement. The prior owner sold the property in February 2022 for \$291,000—but without advertising the property for sale. The transaction did not occur between related parties or pursuant to a foreclosure action or a contract for deed.

The appellant contends the \$31,744 subject assessment overvalues the subject property. The appellant supported the overvaluation argument with a copy of the Residential Real Estate Purchase and Sale Contract, or closing disclosure, demonstrating that buyers Joseph Magnelli and Anna M. Magnelli agreed to the \$291,000 purchase price for the subject property in January 2022. The transaction closed in February 2022.

In its “Notes on Appeal,” the county board of review maintained that the subject was correctly assessed at \$31,744. To fortify this position, the board of review supplied details about four sales of one-story masonry properties within a quarter mile of the subject. The county board of review’s comparable sales, which involved 63- to 67-year-old improvements between 1,092 and 1,142 square feet in size, occurred between August 2020 and July 2022 for purchase prices from \$340,000 to \$645,000, or \$308.25 to \$589.58 per square foot.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in the Cook County Board of Review’s 2023 assessment of the subject. When a taxpayer bases a property tax appeal on overvaluation, 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 a recent sale or appraisal of the subject property, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant satisfied this burden of proof.

In this record, the appellant attached to the petition a real estate purchase and sale contract that indicated the subject sold in February 2022, within two years of the 2023 assessment date, for \$291,000. Moreover, nothing about the parties’ submissions affirmatively shows the transaction was not at arms’ length or otherwise misaligned with fair market value. By contrast, the board of review submitted four recent sales, none of which is as dispositive of subject market value as the sale of the instant property. As such, given the proximity of the purchase date to the assessment date, the credibility of the evidence supporting the purchase price, and the lack of evidence to the contrary, PTAB finds that the market valued the subject property around \$291,000. PTAB accordingly concludes the appellant showed overvaluation by a preponderance of the evidence and a reduction in the total subject assessment to \$29,100, commensurate with the indicated market value and the appellant’s request, is warranted.

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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