



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

APPELLANT: Chester & Helen Talaga Trust  
DOCKET NO.: 17-30701.001-R-1  
PARCEL NO.: 24-07-110-017-0000

The parties of record before the Property Tax Appeal Board are Chester & Helen Talaga Trust, the appellants, by attorney Nikos D. Tsonis, of Tsonis & Associates, LLC 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:** \$3,420  
**IMPR.:** \$36,804  
**TOTAL:** \$40,224

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 2017 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 three-story five-unit building of masonry exterior construction with 5,028 square feet of building area. The dwelling was constructed in 1996 and is approximately 22 years old. Features of the property include a concrete slab foundation, central air conditioning and a 5-car garage. The property has a 6,840 square foot site and is located in Chicago Ridge, Worth Township, Cook County. The property is a class 2-11 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 an appraisal estimating the subject property had a market value of \$350,000 as of January 1, 2017. The appraisal was prepared by The Metron Group and signed by Peter Poulos, MAI and certified general real estate appraiser.

The intended use of the appraisal was identified for ad valorem tax assessment purposes with users of the report identified any authorized representatives of the owner/client.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value utilizing four comparable sales. The comparables have land-to-building ratios of 1.31 or 2.56 and are improved with three-story six-unit buildings that have either 6,000 or 6,078 square feet of building area. The properties were built in 1972 or 1979. The comparables sold from May 2016 to September 2016 for prices ranging from \$410,000 to \$437,500 or from \$67.46 to \$71.98 per square foot of living area, land included. The comparables have an unadjusted range of price per unit from \$68,333 to \$72,917.

The appraiser adjusted comparable #4 by 5% in the market conditions line, with no further explanation. In the analysis of comparable properties, the appraiser states that the subject and comparable sales share several characteristics and were considered generally similar to the subject with "no apparent need for significant adjustments." After making the adjustment to comparable #4, a range of adjusted sale price per unit from \$68,333 to \$74,375 was arrived at by the appraiser. Using these adjusted price per unit values, the appraiser determined a per unit value of \$70,000 to be appropriate for the subject property and therefore an estimated opinion of market value of \$350,000 for the subject property ( $\$70,000 \times 5 = \$350,000$ ).

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$46,203. The subject's assessment reflects a market value of \$462,030 or \$91.89 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 four comparable sales located in the subject's assessment neighborhood code. Board of review comparables #1, #2 and #3 are the same properties as the appraisal comparables #1, #2 and #3, respectively. The comparables each have sites with 7,956 square feet of land area and are improved with three-story six-unit buildings of masonry exterior construction that have 6,078 square feet of living area. The properties are either 44 or 46 years old and have a concrete slab foundation. The comparables sold from July 2015 to September 2017 for prices ranging from \$410,000 to \$437,500 or from \$67.46 to \$71.98 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In rebuttal, the attorney for the appellant argued that the appraisal submitted by the appellant is the most accurate indication of the subject property's 2017 fair market value. The attorney addressed each of the board of review's comparables indicating that the sale prices per square foot for each comparable essentially supports the value conclusion for the subject property.

### **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 appellants submitted an appraisal while the board of review submitted four comparable sales for the Board's consideration. Three of the board of review's comparables were also utilized by the appraiser. The Board gave less weight to the estimated opinion of market value contained in the appraisal report due, in part, to the lack of adjustments to the comparable properties despite differences in the subject and comparable property characteristics such as age, building size, central air conditioning and garage. Additionally, the subject property is an income producing property. Development of the income approach to value would have provided additional support for the appraiser's opinion of value developed using the sales comparison approach. The Board shall, however, consider the raw sales data contained in the appraisal report.

The Board finds the best evidence of market value to be the common comparables #2 and #3 along with board of review comparable #4 which sold more proximate to the January 1, 2017 assessment date at issue. These comparables sold from May 2016 to September 2017 for prices ranging from \$420,000 to \$437,500 or from \$69.10 to \$71.98 per square foot of living area, land included. The subject's assessment reflects a market value of \$462,030 or \$91.89 which falls above the range of the best comparables in the record. The Board gave less weight to the remaining comparables which sold in 2015 and are less likely to reflect market value as of the January 1, 2017 assessment date. After considering adjustments to the comparables for differences when compared to the subject, such as age, building size and garage, 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: July 20, 2021



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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