



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

APPELLANT: Joseph Colla  
DOCKET NO.: 21-30987.001-R-1  
PARCEL NO.: 17-06-112-047-1001

The parties of record before the Property Tax Appeal Board are Joseph Colla, the appellant, 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:** \$8,188  
**IMPR.:** \$52,312  
**TOTAL:** \$60,500

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 2021 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 is a condominium unit in a 25-year-old building with six units that is located in Chicago, West Chicago Township, Cook County. Features of the unit include central air conditioning, a deck, two fireplaces, seven total rooms, three bedrooms, three full bathrooms, and 2,370 square feet of living area. The unit owner has an assigned outdoor parking space and has the right to use the common areas, which include hallways and walkways. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts 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 \$605,000 as of February 15, 2021. The appraiser employed the sales comparison approach, relying on sales of six condominium units located between 0.01 miles and 0.44 miles from the subject unit. Those sales took place between March 2020 and January 2021 for amounts ranging from

\$520,000 to \$652,500, or between \$245.83 and \$322.78 per square foot of living area. The appraisal adjusted the sales price of each comparable property based on differences between the subject property and the comparable. The appraiser considered common elements of the subject and the comparables, but this did not result in any adjustments because they were similar, including hallways and walkways, but not including any recreational areas.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$73,791, or \$311.35 per square foot of living area. The subject's assessment reflects a market value of \$737,910, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The board of review also submitted its Condominium Analysis Results for 2021 for the building in which the subject unit was located. This analysis examined sales of four units in the building that took place between February 2019 and October 2021 for amounts ranging from \$430,000 to \$595,000. The total amount of consideration for these sales was \$2,032,000, and the four units combined comprised a 56.725% ownership interest. This indicated a total market value of \$3,582,194 for all six units, or an assessed value of \$358,219. Because the subject unit comprised a 24.994% ownership interest, its assessed value would be \$89,533, which exceeds the actual assessment.

### **Analysis**

The appellant contends 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); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 that the best evidence of the subject's market value is the appraisal submitted by the appellant. That appraisal employed the sales comparison approach, relying upon recent sales of six suggested comparable properties. The appraisal described how and why the sale prices of the comparable properties were adjusted to account for differences in features between them and the subject, and the appraiser determined that the subject's market value was \$605,000. The appraisal included an examination of the common elements in the subject unit's building and the buildings housing the comparables. In contrast, the board of review's evidence consisted of unadjusted sales data from other condominium units in the building.

Accordingly, the Board finds the subject property had a market value of \$605,000 as of the assessment date at issue. Based on the evidence, the Board therefore 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:

August 22, 2023



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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