



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

APPELLANT: David M. & Constance Stumbras
DOCKET NO.: 21-47515.001-R-1
PARCEL NO.: 14-32-219-021-0000

The parties of record before the Property Tax Appeal Board are David M. & Constance Stumbras, the appellants, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. 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 **No Change** 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: \$26,250
IMPR.: \$108,534
TOTAL: \$134,784

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 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 consists of a 3-story dwelling of masonry exterior construction with 2,347 square feet of living area.¹ The dwelling is approximately 143 years old. Features of the home include a full basement with finished area, central air conditioning, a fireplace, and a 1-car garage. The property has a 2,100 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-10 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 \$1,100,000 as of January 1, 2021. The appraisal was prepared by Thomas Boyle, Jr., an

¹ The Board finds the best size and description of the subject property was gleaned from the appraisal which included a building sketch with dimensions and area calculations.

Associate Real Estate Trainee Appraiser who inspected the interior and exterior of the subject property and Supervisory Appraiser, David Conaghan, a Certified General Appraiser who inspected the exterior only of the subject property. The appraiser reported the property rights appraised were fee simple interest and the purpose of the appraisal was to assist the client for an ad valorem tax assessment. In estimating the subject's market value, the appraiser utilized the sales comparison approach only.

In estimating the value of the subject property, the appraiser developed sales comparison approach to value utilizing five comparable sales that are located within .60 of a mile from the subject. The comparables have sites ranging in size from 1,936 to 2,744 square feet of land area and are improved with Traditional dwellings of brick or vinyl siding exterior construction ranging in size from 3,000 to 3,618 square feet of living. The dwellings are 29 to 135 years old, two of which have full finished basements. The comparable have varying degrees of similarity in features. The comparables sold from March to September 2020 for prices ranging from \$1,051,000 to \$1,223,000 or from \$315.62 to \$392.16 per square foot of living area, including land. After considering adjustments to the comparable sales for differences when compared to the subject, the appraiser arrived at an estimated market value of \$1,100,000 as of January 1, 2021. Based on this evidence, the appellants requested a reduction in the subject property's total assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$134,784. The subject's assessment reflects a market value of \$1,347,840 or \$574.28 per square foot of living area, including land, when using 2,347 square feet of living area and applying the level of assessment of 10% for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales with the same assessment neighborhood code as the subject and located within a ¼ of a mile from the subject. The comparables have sites with 2,083 or 2,750 square feet of land area and are improved with 2-story dwellings of masonry exterior construction that range in size from 1,636 to 2,284 square feet of living area. The dwellings are 128 or 143 years old and have full basements with finished area. Two comparables have central air conditioning. Three comparables each have one or two fireplaces. Each comparable has a 2-car garage. The comparables sold from January to May 2021 for prices ranging from \$1,374,000 to \$1,993,800 or from \$732.66 to \$1,009.97 per square foot of living area, land included. Based on this evidence, the board of review requested that the assessment be confirmed.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains an appraisal submitted by the appellants and four comparable sales provided by the board of review to support their respective positions.

As to the appraisal, the Board finds the appraiser used comparables that were 26% to 54% larger in dwelling size and three comparable sales which are significantly newer dwellings and lack basement foundations. For these reasons, the Board gave little weight to the appraiser's conclusion of value and the comparable sales utilized in the report.

The Board also gives less weight board of review comparable sales #2 and #3 which are less similar in dwelling size (29% and 14%), respectively, when compared to the subject.

The Board finds the best evidence of market value to be board of review comparables #1 and #3 which overall are most similar to the subject in location, age, dwelling size, and most features. These comparables sold in January and April 2021 for prices of \$1,595,000 and \$1,965,000 or \$732.66 and \$860.33 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,347,840 or \$574.28 per square foot of living area, including land, which falls below the best comparable sales in the record. After considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is well supported. Therefore, no reduction in the subject's assessment 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 20, 2025



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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