



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

APPELLANT: NOUGATIER LLC  
DOCKET NO.: 22-46656.001-R-1  
PARCEL NO.: 13-09-301-012-0000

The parties of record before the Property Tax Appeal Board are NOUGATIER LLC, the appellant, by attorney John J. Piegore, of Sanchez, Daniels & Hoffman LLP 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:** \$7,866  
**IMPR.:** \$20,134  
**TOTAL:** \$28,000

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 2022 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 2-story mixed-use building of masonry exterior construction with 6,732 square feet of gross building area<sup>1</sup> and is approximately 88 years old. Features include a full basement, 2 full and 2 half bathrooms and central air conditioning. The property has a 3,933 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-12 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on March 4, 2022 for a price of \$280,000. The appellant disclosed in Section IV of the appeal petition that the subject

---

<sup>1</sup> The Board finds the subject building has 6,732 square feet of gross building area as reported by the board of review, which was unrefuted by the appellant.

property was purchased from Ralph Ching Kuo and Chen Yung Keo, the parties to the transaction were not related, the property was sold by the owners and advertised for sale by a sign for "0" period of time., and the sale was not due to foreclosure action or using a contract for deed. To document the sale, the appellant submitted copies of the plat of survey for the subject property and the Master Statement (settlement statement) reiterating the sellers' names as well as the sale date and purchase price of the subject property. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,000. The subject's assessment reflects a market value of \$490,000 or \$72.79 per square foot of building area, land included, when applying the level of assessment 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 properties that have different assessment neighborhood codes than the subject. The board of review did not disclose the proximity of the properties to the subject property and also contends there were "Few matching comps in subjects [sic] area search expanded." Comparable #1 will not be included in the Board's analysis as this comparable only contained equity data which is not responsive to the appellant's overvaluation argument. The comparables #2, #3 and #4 have sites that range in size from 3,098 to 6,125 square feet of land area that are improved with 2-story or 3-story, class 2-12 mixed-use buildings of masonry exterior construction ranging in size from 5,292 to 6,048 square feet of gross building area. The comparables each have partial or full basements and 3 or 4 full and 1 or 4 half bathrooms. Two comparables each have central air conditioning, and one comparable has a 4-car garage. These three comparables sold from March 2021 to March 2022 for prices ranging from \$549,000 to \$715,000 or from \$103.74 to \$127.45 per square foot of building area, including land. The board of review further disclosed the subject sold in March 2022 for a price of \$280,000. 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 appellant submitted data related to the purchase of the subject property and the board of review submitted three comparable sales in support of their respective positions before the Property Tax Appeal Board. The Board gives less weight to the board of review's comparable sales for which the proximity to the subject was not disclosed but the evidence indicated these comparables were located in different assessment neighborhoods than the subject property. Furthermore, these comparables have additional, substantial disparities from the subject including, but not limited to significant differences in their lot sizes, design, ages, bathroom counts, building sizes and/or other amenities.

The Board finds the best evidence of market value in the record to be the purchase of the subject property in March 2022 for a price of \$280,000 or \$41.59 per square foot of living area, including land. The appellant provided evidence demonstrating the sale had elements of an arm's length transaction asserting in Section IV of the appeal petition that the parties to the transaction were not related, the property was sold by the owner and was advertised for a sale with a sign, and the sale was not due to a foreclosure action or using a contract for deed, which was unrefuted by the board of review. In support of the transaction, the appellant submitted a copy of the settlement state affirming the names of the sellers as well as the sale date and price of the subject property as disclosed in the appellant's appeal petition. The Board further finds that the board of review did not present any evidence to challenge or to effectively refute the contention that the purchase price was reflective of market value. Moreover, the board of review agreed that the subject property was purchased in March 2022 for \$280,000. The Board finds the subject's purchase price of \$280,000 is considerably less than the market value reflected by the subject's assessment of \$490,000. Based on this record, the Board finds the subject property had a market value of \$280,000 as of January 1, 2022. Since market value has been determined the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% 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: \_\_\_\_\_

August 19, 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

NOUGATIER LLC, by attorney:  
John J. Piegore  
Sanchez, Daniels & Hoffman LLP  
333 West Wacker Drive  
Suite 500  
Chicago, IL 60606

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602