



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

APPELLANT: Frank Ungari
DOCKET NO.: 23-30951.001-R-1
PARCEL NO.: 17-06-117-043-0000

The parties of record before the Property Tax Appeal Board are Frank Ungari, the appellant(s), by attorney Brian S. Maher, of Weis, DuBrock, Doody & Maher 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: \$24,800
IMPR.: \$48,700
TOTAL: \$73,500

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 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 has two improvements: a 126-year-old, two-story, two-unit building of masonry construction and a single-unit coach house over a one-car garage. The two-story dwelling contains 2,464 square feet of gross living area and the coach house contains 1,400 square feet of living area, for a total of 3,864¹ square feet. Each of the three units had one bathroom. The property has a 3,100 square foot site and is located in Chicago, West Chicago Township, Cook County. The two-unit building is classified as a Class 2-11 property and the

¹ The board of review indicated that the Class 2-11 property has 2,338 square feet of living space and the Class 2-03 has 1,489 square feet of living space, for a total of 3,827 square feet of living space. The board finds the description of subject property in the appraisal to be the most persuasive as the appraiser indicated that he made an interior and exterior inspection of the subject property and there is no indication in the record that the board of review had any personal knowledge of the size of the improvements on the subject property.

one-unit improvement is classified as a Class 2-03 under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation based on a recent appraisal. The appraisal was written and signed by a licensed appraiser who submitted their credentials with the report. The appraiser also conducted an on-site inspection of the subject property. In support of this argument the appellant submitted an appraisal estimating the subject property had a reconciled market value \$735,000 as of January 1, 2021. The appraiser used two approaches to value: the income capitalization approach and the sales comparison approach.

First, the appraiser utilized the income capitalization approach to value. Through analyzing market rents, the appraiser determined the potential gross income, vacancy and collection rates, and operating expenses to reach a net operating income (rounded). The appraiser then determined the overall loaded capitalization rate and applied to the net operating income to determine the estimated market value of the subject property at \$740,000.

Next, the appraiser analyzed the sales comparison approach. The appraiser examined six comparable sales that occurred between June 2020 and August 2021. The appraiser considered a number of "Elements of Comparison" when analyzing the six comparable sales. Based on these sales and the differences of the comparable sales to that of the subject property, the appraiser concluded that based on the sales comparison approach the subject property had a market value of \$710,000.

The appraiser gave primary weight to both the income capitalization approach and the sales comparison approach, concluding that the subject property as of January 1, 2021, had a market value of \$735,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$118,712. The subject's assessment reflects a market value of \$1,187,120 or \$310.20 per square foot of living area, land included, when using the 10% level of assessments 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 Class 2-11 suggested sales comparables with varying degrees of similarity to the subject. The board of review did not submit any Class 2-03 comparables. Based on this evidence, the board of review requested that the assessment be confirmed.

Prior to a scheduled February 14, 2025, hearing before a PTAB Administrative Law Judge the parties entered into a written agreement to waive hearing and have a decision rendered based on the previously submitted evidence.

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 Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appraisal utilized the income capitalization approach and the sales comparison approach. The appraisal was written and signed by a licensed appraiser who submitted their credentials with the report. The appraiser used their experience and expertise to make adjustments to their data to better draw comparisons to the subject property. In contrast, the board of review submitted unadjusted sales comparable that only covered one improvement. The appraisal report was also uncontroverted. The subject's assessment reflects a market value of \$1,187,120 which is above the appraised value of \$735,000. The Board finds the subject property had a market value of \$735,000 as of the assessment date at issue. Since market value has been established 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance shall apply.

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: June 16, 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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