



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

APPELLANT: Victor Estrada & Erika L. Valladolid
DOCKET NO.: 24-30826.001-R-1
PARCEL NO.: 16-28-126-030-0000

The parties of record before the Property Tax Appeal Board are Victor Estrada & Erika L. Valladolid, the appellants, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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: \$4,515
IMPR.: \$17,482
TOTAL: \$21,997

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 2024 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 two-story multi-family building of masonry exterior construction with 1,936 square feet of gross building area. The building is approximately 117 years old. Features of the building include a full basement, two bathrooms and a 2-car garage.¹ The property has a site with 4,200 square feet of land area and is located in Cicero, Cicero Township, Cook County. The subject is classified as 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 information on four comparables that have the same assessment neighborhood code as the subject and are located within .15 of a mile from the subject property.

¹ The parties differ as to whether or not the subject building has a fireplace. The appellants reported the subject has one fireplace, while the board of review reported the subject has no fireplace.

The comparables have sites that contain 3,150 or 4,725 square feet of land area. The comparables are class 2-11 properties that are improved with two-story multi-family buildings of frame or masonry exterior construction ranging in size from 1,722 to 2,443 square feet of gross building area. The buildings range in age from 61 to 120 years old. The comparables each have a full basement, one of which is finished with an apartment. Each comparable has two or three bathrooms, one or two fireplaces and either a 1.5-car or a 2-car garage. The properties sold from November 2022 to March 2024 for prices ranging from \$145,000 to \$260,000 or from \$70.25 to \$106.43 per square foot of gross building area, land included. Based on this evidence, the appellants requested the subject's total assessment be reduced to \$16,508, reflecting a market value of \$165,080 or \$85.27 per square foot of gross 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%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$21,997. The subject's assessment reflects a market value of \$219,970 or \$113.62 per square foot of gross building area, including land, 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 comparables that have the same assessment neighborhood code as the subject and are located approximately ¼ of a mile from the subject property, one of which is also along the same street as the subject. The comparables have sites that range in size from 3,625 to 4,725 square feet of land area. The comparables are class 2-11 properties that are improved with two-story multi-family buildings of masonry exterior construction ranging in size from 1,952 to 2,178 square feet of gross building area. The buildings range in age from 102 to 113 years old. Two comparables each have a concrete slab foundation and two comparables each have a full basement. Each comparable has two or three bathrooms and three comparables each have a two-car garage. The properties sold from March 2023 to February 2024 for prices ranging from \$282,500 to \$375,000 or from \$144.72 to \$172.18 per square foot of gross building area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 parties submitted eight comparable properties for the Board's consideration. The Board has given less weight to the appellants' comparables #1, #2 and #3 due to differences from the subject in building size and/or age. The Board has also given less weight to the appellants' comparable #4 which has a sale date that occurred in 2022, less proximate in time to the lien date at issue than other sales in the record.

The Board finds the best evidence of market value to be the four comparables submitted by the board of review, which sold more proximate in time to the January 1, 2024 assessment date and are similar to the subject in location, site size, building size, design and age. However, two comparables each have a concrete slab foundation in contrast the subject's basement foundation and one comparable lacks a garage, a feature of the subject, suggesting upward adjustments for these differences would be required to make the comparables more equivalent to the subject. and some features. Conversely, one comparable has an additional bathroom suggesting a downward adjustment for this difference would be necessary. Nevertheless, the comparables sold from March 2023 to February 2024 for prices ranging from \$282,500 to \$375,000 or from \$144.72 to \$172.18 per square foot of gross building area, land included. The subject's assessment reflects a market value of \$219,970 or \$113.62 per square foot of gross building area, including land, which is below the range established by the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not 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:

May 19, 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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