



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

APPELLANT: Bill Sardegna
DOCKET NO.: 24-31234.001-R-1
PARCEL NO.: 14-31-126-007-0000

The parties of record before the Property Tax Appeal Board are Bill Sardegna, the appellant(s), by attorney Max E. Callahan, of Siegel & Callahan, 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 **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: \$20,880
IMPR.: \$50,120
TOTAL: \$71,000

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 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 one parcel on which stands two improvements; a two-story dwelling of masonry construction with 1,540 square feet of living area and a one-story dwelling of frame construction with 1,120 square feet of living area¹. The dwellings were approximately 134 years old. Features of the homes include full basements and a two-car garage. The property has a 2,400 square foot site and is located in Chicago, West Chicago Township, Cook County. The property is a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance. The appellant disclosed that this is not an owner-occupied residence.

The appellant contends 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 \$710,000

¹ The Board finds that these are the square feet of living area of the improvements based on the inspection by the appraiser.

as of January 1, 2024. The appraisal was prepared by a certified general real estate appraiser who asserted that the highest and best use of the subject property as improved was its current use. The appraiser conducted an inspection of the subject property on November 21, 2024, and used the sales comparison and income capitalization approaches to valuation.

Under the sales comparison approach, the appraiser utilized five comparable sales for which the appraiser did not provide proximity to the subject property. The comparable properties sites ranged in size from 1,800 to 3,600 square feet of land area and from 2,234 to 4,201 square feet of building area. The properties are each improved with a multi-unit building of frame or masonry construction that range in size from three to four combined units that were built from 1886 to 1911. The comparable properties sold from February 2022 to February 2024 for prices ranging from \$592,000 to \$835,000. The appraiser adjusted, as applicable, for size, age/condition, construction quality, and on-site parking. The appraiser concluded that based on the sales data and applying adjustments to the comparable sales for differences from the subject, the subject had a market value under the sales comparison approach of \$690,000.

Under the income capitalization approach, the appraiser analyzed eleven comparable rental units of various bathroom and bedroom configurations for which the appraiser did not provide proximity to the subject. Considering the data from the rental comparable properties, the appraiser estimated an annual total potential gross income of \$84,600. The appraiser stabilized the vacancy rate at 5.0% for an effective gross income (EGI) of \$80,370. Expenses were deducted to arrive at a net operating income (NOI) of \$68,867. The appraiser calculated the overall loaded capitalization rate of 9.61%. Dividing the NOI of \$68,867 by the capitalization rate of 9.61%, the appraiser arrived at a value under the income approach of \$715,000, rounded.

In reconciling the two approaches to value, the appraiser gave equal weight to the income capitalization and sales comparison approaches to value. The appraiser considered that the value of the property to an owner-user may best be served by the sales comparison approach while the value of the property to an investor may be best served by the income capitalization approach. Therefore, the appraiser arrived at the final opinion of value for the subject property of \$710,000 as of January 1, 2024.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$124,695. The record includes the Cook County board of review 2024 assessed valuations decision which indicates a total assessment of \$121,695. The subject's assessment reflects a market value of \$1,216,950 or \$457.50 per square foot of living area, including land, when applying the level of assessments for class two 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 sales properties which sold from April 2022 to October 2024 for sales prices from \$853,000 to \$925,000 or from \$456.92 to \$557.64 per square foot of living area, land included in the sales prices. These properties were located within a 0.9-mile radius of the subject and were from 1,596 to 1,950 in square feet of living area. In its 'Notes on Appeal' the board of review asserts that the subject property is multi-code with two class 2-11 improvements for which the improvement with less square feet of living area is recognized but the improvement

with more square feet of living area is not acknowledged by the appellant. 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 Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appellant submitted a credible appraisal report with reasonable and logical adjustments for differences from the subject. The board of review claimed that both improvements were not recognized in the appellant's assertion of market value. The Board finds that the appraisal did recognize and value the entire property, including both improvements. The comparable sales properties presented by the board of review lacked adjustments for significant differences when compared to the subject property. The subject's current assessment reflects a market value of \$1,216,950, which is higher than the appraised value of \$710,000. Based on the evidence presented, the Board finds the subject property is overvalued and a reduction commensurate with the appellant's request is warranted. Since market value has been established the level of assessment for class two property under the Cook County Real Property Assessment Classification Ordinance 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: _____

October 20, 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 9-215 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

Bill Sardegna, by attorney:
Max E. Callahan
Siegel & Callahan, P.C.
141 W. Jackson
Suite 1795
Chicago, IL 60604

COUNTY

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