



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

APPELLANT: Charlie Keel
DOCKET NO.: 18-28756.001-R-1 through 18-28756.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Charlie Keel, the appellant, by attorney Robert Rosenfeld of Robert H. Rosenfeld and Associates, LLC 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
18-28756.001-R-1	14-28-115-067-1001	6,766	30,343	\$37,109
18-28756.002-R-1	14-28-115-067-1002	7,088	31,788	\$38,876
18-28756.003-R-1	14-28-115-067-1003	7,625	34,196	\$41,821

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 2018 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 three-story, three-unit, residential condominium building with 4,650 square feet of living area. The building is approximate 23 years old. The subject property also has a two-car garage. The property has a 3,159 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on five comparable sales in Section V of the appeal. The comparables are described as one class 2-99 and four class 2-11 properties of masonry constructions ranging in size from 4,176 to 8,400 square feet of living area and have either four or six units. The buildings range in age from approximate 98 to 131 years old. Two of the

comparables have a two-car garage. The comparables have sites ranging in size from 2,975 to 7,248 square feet of land area. The sales occurred from May 2017 to April 2018 for prices ranging from \$1,040,000 to \$1,575,000 or from \$187.50 to \$293.08 per square foot of building area or from \$260,000 to \$393,750 per unit. The appellant requested the subject's assessment be reduced to \$88,417.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$117,806. The subject's assessment reflects a market value of \$1,178,060 or \$253.35 per square foot of living area and \$392,687 per unit, including land, when applying Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10%.

In support of its contention of the correct assessment the board of review submitted limited information on four comparable sales described as being improved with class 2-11 properties ranging in size from 3,795 to 6,259 square feet of living area and having three or four units. The sales occurred from March 2015 to January 2018 for prices ranging from \$1,245,000 to \$2,438,000 or from \$269.41 to \$399.54 per square foot of building area and \$311,250 to \$812,667 per unit.

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

The record contains nine sales submitted by the parties to support their respective positions. The Board gives less weight to appellant's comparable #1 due to the fact the building is approximately 81% larger than the subject building. The Board gives less weight to board of review comparables #2 and #3 as the sale dates are less proximate in time to the assessment date at issue than the remaining sales. Notwithstanding the differences in ages, the Board finds the best evidence of market value to be appellant's comparable sales #2, #3, #4 and #5¹ and board of review comparable sales #1 and #4. These comparables sold for prices ranging from \$1,040,000 to \$1,894,420 or from \$200.00 to \$328.06 per square foot of living area and from \$260,000 to \$473,605 per unit, including land. The subject's assessment reflects a market value of \$1,178,060 or \$253.35 per square foot of living area and \$392,687 per unit, including land, which is within the range established by the best comparable sales in this record. Based on this evidence the Board finds a reduction in the subject's assessment is not justified.

¹ The Board has designated the appellant's comparable at 3307 N Kenmore Ave (PIN 14-20-417-021-0000) as comparable #5.

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 24, 2021



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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