



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

APPELLANT: Stephen Loch  
DOCKET NO.: 18-28757.002-R-1  
PARCEL NO.: 14-20-100-049-1003

The parties of record before the Property Tax Appeal Board are Stephen Loch, 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 ***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:** \$8,893  
**IMPR.:** \$35,557  
**TOTAL:** \$44,450

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 residential condominium unit located in a three-story three-unit building of masonry construction that is approximately 118 years old. The unit has 1,450 square feet of living area and two bathrooms. The property has a 4,131 square foot site and is located in Chicago, Lake View Township, Cook County. The subject property is classified as a class 2-99 residential condominium under the Cook County Real Property Assessment Classification Ordinance.

The appellant marked comparable sales and assessment equity as the bases of the appeal. In support of this argument the appellant submitted information on three comparable sales, which includes the sale of the subject property in August 2013 for a price of \$450,000. The two remaining comparables are condominium units located in the subject's building with 2,400 and 1,450 square feet of living area, respectively. Comparable #1 has a basement with finished area

as well as a one-car garage. Comparable #2 has a one-car garage. These properties sold in March 2018 for prices of \$663,650 and \$393,300 or \$276.52 and \$271.24 per square foot of living area, respectively. Comparables #1 and #2 have improvement assessments of \$55,922 and \$41,249 or \$23.30 and \$28.44 per square foot of living area, respectively. The appellant reported the subject property has a total assessment of \$49,429, which reflects a market value of \$494,290 or \$340.89 per square foot of living when applying the Cook County Real Property Assessment Classification level of assessment for class 2-99 property of 10%. The subject has an improvement assessment of \$40,536 or \$27.95 per square foot of living area. The appellant requested the subject's assessment be reduced to \$44,451.

The board of review did not submit its "Board of Review Notes on Appeal" or any evidence in support of the assessment or to refute the appellant's argument.

### **Conclusion of Law**

The appellant contends in part 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 only evidence of market value was presented by the appellant, which included the sale of the subject property and two other condominium units in the subject's building. The comparables and the subject property sold for prices ranging from \$271.24 to \$310.34 per square foot of living area. Two units sold in 2018 for prices of \$271.24 and \$276.52 per square foot of living area. The subject's assessment reflects a market value of \$340.89 per square foot of living area, including land, which is above the range established by the only sales in this record. The board of review did not submit any evidence in support of its assessment of the subject property or to refute the appellant's argument as required by section 1910.40(a) of the rules of the Property Tax Appeal Board. (86 Ill.Admin.Code 1910.40(a)). Based on this evidence the Board finds a reduction in the subject's assessment is justified based on overvaluation.

Due to the reduction to the subject's assessment based on the market value argument, the Board finds a further reduction to the assessment based on assessment equity 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: 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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