



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

APPELLANT: Bakle Propertiees LLC
DOCKET NO.: 20-21676.001-R-1
PARCEL NO.: 16-01-204-011-0000

The parties of record before the Property Tax Appeal Board are Bakle Propertiees LLC, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$8,007
IMPR.: \$24,970
TOTAL: \$32,977

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 2020 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 2-story multi-family building of frame exterior construction with 2,068 square feet of building area. The building is approximately 130 years old. Features of the property include a concrete slab foundation. The property has a 3,140 square foot site and is located in Chicago, West Chicago Township, Cook County. The building is classified as a class 2-11 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 four comparable sales that were located within the same neighborhood code as the subject. The comparables have lots ranging in size from 775 to 3,960 square feet of land area. The parcels are each improved with class 2-11 buildings of frame exterior construction ranging in size from 1,960 to 2,856 square feet of building area and range in age from 105 to 128 years old. The comparables each have a crawl space or concrete slab

foundation. Each comparable is reported to have central air conditioning. One dwelling has a 1-car garage. The comparables sold from March 2018 to September 2019 for prices ranging from \$310,000 to \$430,000 or from \$150.49 to \$175.00 per square foot of building area, land included.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$32,977. The requested assessment would reflect a total market value of \$329,770 or \$159.46 per square foot of 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 \$37,694. The subject's assessment reflects a market value of \$376,940 or \$182.27 per square foot of 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%.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales that were located within the same neighborhood code as the subject. The comparables have lots ranging in size from 2,750 to 3,525 square feet of land area. The parcels are improved with class 2-11, 2-story or 3-story multi-family buildings of frame or masonry exterior construction ranging in size from 1,848 to 2,772 square feet of building area and range in age from 120 to 123 years old. Each comparable has a full unfinished basement. One comparable has a 2-car garage. The comparables sold from May to November 2019 for prices ranging from \$450,000 to \$555,000 or from \$162.34 to \$264.79 per square foot of building area, including land.

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 parties submitted a total of seven comparable sales to support their respective positions before the Property Tax Appeal Board. The Board gives less weight to the appellant's comparable #2 which is a substantially larger building than the subject. The Board gives less weight to the appellant's comparable #3 which has as a substantially smaller lot size than the subject, features a garage, unlike the subject, and sold in 2018 which is less proximate in time to the subject's January 1, 2020 assessment date at issue than other comparables in this record. The Board also gives reduced weight to the board of review comparables which have basement foundations, unlike the subject. Additionally, board of review comparable #1 features a garage, unlike the subject, and board of review comparable #3 is a substantially larger building than the subject with a dissimilar 3-story design, in contrast to the subject's 2-story design.

Thus, the Board finds the best evidence of market value to be the appellant's comparables #1 and #4. These comparables are each similar to the subject in location, age, dwelling size, and most features, except each comparable is reported to have central air conditioning, unlike the subject. These two properties sold in May 2019 and July 2019 for prices of \$310,000 and \$385,000 or of \$150.49 to \$175.00 per square foot of building area, land included, respectively. The subject's assessment reflects a market value of \$376,940 or \$182.27 per square foot of building area, land included, which is bracketed by the two best comparable sales in this record in terms of overall market value but above on a price-per-square-foot basis. Based on this record and after considering adjustments to the two best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is not supported and a reduction in the subject's assessment commensurate with the appellant's request is warranted.

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:

April 16, 2024



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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