



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

APPELLANT: Piotr Sienko
DOCKET NO.: 21-22261.001-R-1
PARCEL NO.: 11-32-313-003-0000

The parties of record before the Property Tax Appeal Board are Piotr Sienko, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, Ltd. 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: \$9,727
IMPR.: \$38,773
TOTAL: \$48,500

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 2021 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 110-year-old, 2.5-story, two-unit, multi-family dwelling of masonry construction with 2,598 square feet of living area.¹ Features of the dwelling include a full unfinished basement and a two-car garage. Both units contain three bedrooms and one bathroom. The property has a 4,632 square foot site and is located in Chicago, Rogers Park Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The board of review's description of the subject property indicated it was a 113-year-old, two-story, multi-unit, frame dwelling with 2,648 square feet of living area with a 2.5-car garage. This information is contradicted by the appraiser's description and data. This Board finds the appellant's information to be correct based on the physical inspection, photos and building sketch attached to the appraisal.

The appellant asserts overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal that estimated that the subject property had a market value of \$485,000 as of January 1, 2021. The appraisal used the sales comparison and income approaches. For the income approach, the appraiser relied upon area market rents. The appraiser utilized three rental comparables consisting of three-bedroom/one-bathroom apartments. The rental income for the apartment comparables ranged from \$1,800.00 to \$2,020.00 per month. After making adjustments for differences, the appraiser noted the indicated rent is between \$1,618 and \$1,750 per month and estimated the subject property could generate \$1,675 per month. The appraiser utilized a market rental rate of \$3,350.00 per month in his analysis.

To develop the gross income approach, the appraiser analyzed the property as if it were fully occupied. Rental income from (2) three-bedroom units totaled \$3,350, in estimated projected gross income. This amount was multiplied by a gross rent multiplier of 142.50 for a total fair market value of \$477,375. The appraiser noted that this approach was utilized merely as a guideline due to an insufficient sample size.

For the sales approach, the appraiser relied on five suggested sales comparables of 2.5-story, multi-unit, masonry constructed walk-up buildings that sold between August 2019 and December 2020, for amounts ranging from \$420,000 to \$527,000, or between \$137.63 and \$201.61 price per square foot, land included in the sale prices. The appraiser adjusted the sales prices to account for differences between the comparables and the subject. After applying the adjustments, the appraiser determined that the subject's value was \$170.00 per square foot, for a total value of \$441,660. The appraiser also determined the subject's value was \$490,000 based on a price of \$245,000 per unit. Reconciling these approach results, the appraiser determined that the subject's value was \$485,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$54,999. The subject's assessment reflects a market value of \$549,990, or \$207.70 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of the assessment, the board of review submitted information about sales of three suggested comparable properties. The suggested comparables sold between June 2019 and November 2021 for amounts ranging from \$562,500 to \$995,000, or between \$218.73 and \$242.31 per square foot of living area, land included in the sales prices. All of the comparables are located within a quarter mile of the subject property.

In written rebuttal, the appellant argued the board of review failed to refute the appraiser's determination of the subject fair market value and also failed to provide its own appraisal to contradict the appellant's requested valuation. Additionally, the appellant notes the board of review's comparables contain unadjusted raw data and are fundamentally flawed based on significant differences in characteristics from the subject property and lack of analysis.

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 taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 that the best evidence of the subject's market value is the appraisal submitted by the appellant. That appraisal employed the sales comparison and income approaches. The sales comparison approach relied upon recent sales of five suggested comparable properties. The appraisal stated that the sale prices of the suggested comparable properties were adjusted to account for differences between them and the subject, taking into account such factors as size, condition and location, and the appraiser determined that the subject's market value under that approach was \$485,000 as of January 1, 2021. The appraisal's income approach relied on market rental data from apartments of comparable size units. The appraiser determined that the subject's value under this approach was \$477,375 as of January 1, 2021. Reconciling the two approaches, with the greatest weight given to the sales comparison approach, the appraiser determined that the subject had a market value of \$485,000 as of January 1, 2021.

In contrast, the board of review's evidence consists of inaccurate information regarding the subject property as well as unadjusted raw data concerning comparable properties that have dissimilar living area square footage and amenities than the subject property. Based on the evidence, the Board therefore finds the appellant has proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment is 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

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: July 15, 2025

Clerk of the Property Tax Appeal Board

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

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