



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

APPELLANT: Timothy Davis
DOCKET NO.: 21-29796.001-R-1
PARCEL NO.: 17-17-311-019-0000

The parties of record before the Property Tax Appeal Board are Timothy Davis, the appellant, by attorney Katherine Amari O'Dell, of Amari & Locallo 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:

LAND: \$12,285
IMPR.: \$91,715
TOTAL: \$104,000

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 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 3-story multi-family building of masonry exterior construction with 5,382 square feet of building area. The building was constructed in 1892 with a full unfinished basement and is approximately 129 years old. The property has a 2,730 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject 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 an appraisal of the subject property estimating a retrospective market value of \$800,000 as of January 1, 2021. The appraisal was prepared by William P. Neberieza, a Certified General Real Estate Appraiser. The property rights appraised were fee simple interest.

The intended use of the appraisal was to estimate the market value of subject property for a Ad Valorem tax purposes. The appraiser considered the subject property was in average condition.

In estimating the value of the subject property, the appraiser developed the sales comparison approach to value utilizing four comparable sales that are located approximately .08 of a mile to 1.56 miles from the subject property. The comparables have sites ranging in size from 2,500 to 3,900 square feet of land area and are improved apartment buildings ranging in size from 4,119 to 6,687 square feet of building area. The buildings were constructed from 1880 to 1943 with full unfinished basements. Two comparables have 2-car or 3-car exterior parking spaces. The comparables sold from December 2018 to November 2020 for prices ranging from \$592,500 to \$750,000 or from \$110.86 to \$163.14 per square foot of living area, including land. After considering adjustments to the comparables for differences when compared to the subject, the appraiser arrived at an estimated market value of \$800,000 as of January 1, 2021. Based on this evidence, the appellant requested a reduction in the subject property's total assessment to \$80,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$104,000. The subject's assessment reflects a market value of \$1,040,000 or \$193.24 per square foot of building area, including land, when applying the level of assessment of 10% for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales with the same assessment neighborhood code and property classification code as the subject and located within "subarea" or a ¼ of a mile from the subject. The comparables have sites ranging in size from 2,500 to 2,664 square feet of land area and are improved with 3-story multi-family buildings of masonry exterior construction ranging in size from 5,136 to 6,975 square feet of building area. The buildings are 118 to 138 years old. The comparables have full basements, one of which is finished with an apartment. One comparable has central air conditioning. The comparables sold from April 2018 to April 2020 for prices ranging from \$1,151,500 to \$1,275,000 or from \$169.56 to \$239.49 per square foot of building area. 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains an appraisal submitted by the appellant and four comparable sales provided by the board of review to support their respective positions.

The Board gave less weight to the appraisal due to the fact the appraiser utilized three sales that were less similar to the subject in building size and/or age when other recent comparables sales provided by the board of review were available that were more similar to the subject in building size and age. In addition, one comparable sold in 2018 which is more than two years prior to the January 1, 2021, assessment date. Lastly, the appraiser provided minimal physical descriptions of the comparables utilized in the appraisal for the Board's analysis.

The Board also gave less weight to board of review comparables #1 and which sold in 2018, less proximate in time to the assessment date at issue than the other comparables in the record.

The Board finds the best evidence of market value to be board of review comparables #2 and #3 which are more similar to the subject in age and building size. However, board of review comparable #3 has central air conditioning and a finished basement, suggesting downward adjustments are necessary to make it more equivalent to the subject. These comparables sold in August 2019 and April 2020 for prices of \$1,230,000 and \$1,275,000 or \$214.79 and \$239.49 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,040,000 or \$193.24 per square foot of living area, including land, which falls below the best comparable sales in the record. After considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Therefore, no reduction in the subject's assessment 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: _____

August 19, 2025



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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