



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

APPELLANT: Michael Yohanan
DOCKET NO.: 21-29841.001-R-1
PARCEL NO.: 13-25-313-029-0000

The parties of record before the Property Tax Appeal Board are Michael Yohanan, the appellant, by attorney Thomas E. Sweeney, of Siegel Jennings Co., LPA 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: \$19,375
IMPR.: \$70,625
TOTAL: \$90,000

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, apartment building of masonry exterior construction with 5,690 square feet of building area. The building is approximately 96 years old. Features of the property include four apartment units, one of which is located in the full basement and a 2-car garage. The property has a 1,275 square foot site and is located in Chicago, West Chicago Township, Cook County. The property is 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 \$900,000 as of January 1, 2021. The appraisal was prepared by Chris Posey, a Certified Residential Real Estate Appraiser. The property rights appraised were fee simple. The intended

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

In estimating the value of the subject property, the appraiser developed sales comparison approach to value utilizing three comparable sales that are located approximately .64 of a mile to 1.48 miles from the subject property. The comparables have sites ranging in size from 2,990 to 5,280 square feet of land area and are improved with 3 or 4-unit apartment buildings ranging in size from 4,050 to 4,785 square feet of building area. The buildings were 98 or 118 years old. One comparable has an unfinished basement and one comparable has an apartment in the basement. Two comparables have central air conditioning and two comparables each have a 2-car garage. The comparables sold from December 2019 to November 2020 for prices ranging from \$805,000 to \$895,000 or from \$187.04 to \$215.00 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 \$900,000 as of January 1, 2021. Based on this evidence, the appellant requested a reduction in the subject property's total assessment to \$90,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$106,000. The subject's assessment reflects a market value of \$1,060,000 or \$186.29 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 a ¼ of a mile from the subject. The comparables have sites ranging in size from 3,125 to 4,687 square feet of land area and are improved with 2-story or 3-story buildings of masonry exterior construction ranging in size from 2,698 to 8,751 square feet of building area. The buildings are 113 to 122 years old and have full basements, one of which is finished with a recreation room. One comparable has two fireplaces. Two comparables have either a 1-car or a 2-car garage. The comparables sold from March to October 2019 for prices ranging from \$1,170,000 to \$2,050,000 or from \$234.26 to \$451.11 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 met this burden of proof and a reduction in the subject's assessment is warranted.

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

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appraiser applied adjustments to the comparables for differences from the subject to arrive at an estimated market value of \$900,000. The subject's assessment reflects a market value of \$1,060,000 which is above the appraised value. The Board gave less weight to the board of review comparables due to differences in building size and/or they sold less proximate in time to the January 1, 2022, assessment date and are less likely to be reflective of market value as of that date. Based on this evidence the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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

AGENCY

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