



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

APPELLANT: Mike Piatek
DOCKET NO.: 21-30222.001-R-1
PARCEL NO.: 16-01-421-010-0000

The parties of record before the Property Tax Appeal Board are Mike Piatek, the appellant(s), 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: \$21,627
IMPR.: \$33,123
TOTAL: \$54,750

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 3,798 square feet of living area.¹ The 3-unit building is approximately 111 years old. Features of the property include a full unfinished basement, central air conditioning in two units, enclosed porch, and a 2-car detached garage. The property has an approximately 4,750 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject 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 estimating the subject property had a market value of \$547,500

¹ The Board finds the best evidence of the subject's building size and description was the appellant's appraisal which contained a detailed sketch with dimensions and area calculations. The sketch shows three floors and an unfinished basement.

as of January 1, 2021. The appraisal was prepared by Gary Nusinow, a Certified General Real Estate Appraiser. The property rights appraised were fee simple. The intended use of the retrospective appraisal was to estimate the market value of subject property for ad valorem taxation. The appraiser considered the subject property was in average condition.

In estimating the value of the subject property, the appraiser developed the income and sales comparison approaches to value. Under the income approach the appraiser indicated the market value to be \$552,500. Under the sales comparison approach the appraiser used five comparable sales that sold from October 2019 to March 2021 for prices ranging from \$500,000 to \$665,000 or from \$91.07 to \$145.32 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 \$545,000. The appraiser then reconciled to a value of \$547,500 as of January 1, 2021, by giving some weight to the income approach but most weight to the sales comparison approach. Based on this evidence, the appellant requested a reduction in the subject property's total assessment to reflect the appraised value.

The appellant submitted the Cook County Board of Review Final Decision that disclosed the subject has a total final assessment of \$71,000.

The board of review submitted its "Board of Review Notes on Appeal" on a parcel that is not the subject property.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables which does not address the appellant's overvaluation argument and will not be further addressed in this analysis. Based on this evidence the board of review requests confirmation of the subject's assessment.

In a rebuttal brief, the appellant contends the uniformity comparables submitted by the board of review are unresponsive to the appellant's market value argument.

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 a reduction in the subject's assessment is warranted based on the evidence in the record.

The Board finds the best and only evidence of market value to be the appraisal submitted by the appellant. The Board finds the appraiser developed the income and sales comparison approaches to value to arrive at an estimated market value of \$547,500. The subject's assessment reflects a market value of \$710,000 which is above the appraised value. The Board finds the board of review did not provide any market value evidence in support of the subject's assessment. 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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