



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

APPELLANT: 1930 Damen LLC
DOCKET NO.: 21-30313.001-R-1
PARCEL NO.: 14-31-307-040-0000

The parties of record before the Property Tax Appeal Board are 1930 Damen LLC, the appellant, by attorney Daniel G. Pikarski, of Gordon & Pikarski, 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: \$16,800
IMPR.: \$63,200
TOTAL: \$80,000

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 three-story multi-family apartment building of masonry exterior construction with approximately 4,341 square feet of building area¹ which is approximately 133 years old with a reported effective age of 25 years. The six-units consist of one 2-bedroom/1-bath; one 3-bedroom/1-bath; one 3-bedroom/2-bath (duplex down); two 2-bedroom/2-bath; and one 4-bedroom/2-bath (duplex down) apartments, two of which each have an assigned parking space. The apartments range in size from 800 to 1,600 square feet. The property has an approximately 2,400 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.

¹ The parties disagree on the building size. The appellant's appraiser included a sketch with measurements and based the size determination on a plat of survey concluding 4,341 square feet. The board of review has no data in support of 4,140 square feet. The Board finds the appellant provided well-supported building size data.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared to assist in establishing the correct assessment for *ad valorem* taxation purposes. The report was prepared utilizes fee simple property rights written by Ibi Cole, MAI and Certified General Real Estate Appraiser, estimating the subject property had a market value of \$800,000 as of January 1, 2021.

As to the subject, Cole stated the main issue with the improvements is the older age of the property and the increased level of competition with newer buildings in the area, such that despite updates to the interior, “there is still a shortage of in-building amenities that are typically present in some newer developments.” Amenity examples listed where a common fitness center and/or elevator. Cole also reported that the interior kitchen layout of the subject units is compact in size, leaving little to no room for a separate dining area, which can detract potential renters.

Under the income approach, Cole first analyzed three types of rent comparables, twelve which were two-bedroom units, twelve which were three-bedroom units, and eight that were four-bedroom units. From this process, the appraiser concluded 2-bedroom units rent between \$1,115 and \$1,995 concluding a market rent of \$1,600; 3-bedroom units rent between \$1,700 and \$3,800 concluding a market rent of \$2,500; and 4-bedroom units rent between \$2,160 to \$4,500 concluding a market rent of \$3,500 and parking ranges from \$100 to \$200 with a market rent for parking of \$150. Based on the foregoing market rent conclusions, Cole estimated the subject’s annual stabilized income would be \$170,820. Next, Cole estimated vacancy and collection loss at 10% of potential revenue or \$17,082, resulting in effective gross income of \$153,738. Then the appraiser estimated expenses of \$66,824, which resulted in net operating income of \$86,914. In order to estimate value, it was necessary for Cole to estimate a capitalization rate and determine the real estate tax in order to arrive at a loaded capitalization rate. Based on Cole’s analysis of several sources for rates, a capitalization rate of 8.5% was chosen to which a tax load of 2.298% was added resulting in a loaded capitalization rate of 10.8% to be applied to the net operating income. Using this formula, Cole estimated the value of the subject property using the income approach at \$800,000, including land, rounded.

Using the sales comparison approach, Cole analyzed five sales located from .34 to .95 of a mile from the subject. The parcels range in size from 2,300 to 4,500 square feet of land area which are improved with apartment buildings with either 5-units or 6-units of 1-bedroom or 2-bedroom design that range in age at the time of sale from 101 to 135 years old. The buildings range in size from 3,787 to 5,625 square feet of gross building area. Each is described as being in average condition. Comparable sale #2 has four parking spaces. The properties sold from March 2019 to February 2020 for prices ranging from \$745,000 to \$925,000,000 or from \$151.11 to \$201.02 per square foot of gross building area, including land.

Next the appraiser analyzed the comparables for differences when compared to the subject and applied qualitative adjustments. Through this process, Cole concluded comparables #1 and #4 are overall “inferior” to the subject necessitating upward adjustments. Comparable #3 was deemed to be “balanced” thus lacking any adjustment. Comparables #2 and #4 were each deemed to be overall “superior” to the subject necessitating downward adjustments. Cole reported giving less weight to comparables #4 and #5 due to substantial subsequent renovation/demolition after purchase. From the analysis, Cole concluded the market trend is

moving away from renovating older developments but instead replacing or revamping the existing building with newer more modern building(s). Sale #4 was the only property in the subject's immediate area with the other sales located in superior market areas of West Town. After concluding the subject should fall in the "lower to middle portion of the value range," the appraiser opined a market value for the subject of \$145,000 per unit or \$870,000, including land.

In reconciling the two value approaches, Cole gave dominant weight (80%) to the income approach to value as the subject is reflective of a typical income producing property. Thus, the appraiser's final opinion of value was \$800,000 or \$184.29 per square foot of gross building area, including land, as of January 1, 2021.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$88,422. The subject's assessment reflects a market value of \$884,220 or \$203.69 per square foot of gross building area, including land, 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 four comparable sales located in the same neighborhood code and within ¼ of a mile from the subject. The parcels each contain 2,400 square feet of land area and are improved with class 2-11, one-story, two-story or three-story multi-family buildings of masonry exterior construction. The buildings range in age from 115 to 145 years old and range in size from 1,968 to 3,750 square feet of gross building area. Each comparable has a full basement, three of which have finished area. The comparables have air conditioning and three comparables each have a two-car garage. The comparables sold from April 2018 to July 2019 for prices ranging from \$890,000 to \$1,532,000 or from \$349.71 to \$559.96 per square foot of gross 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 appellant submitted an appraisal of the subject property with an opinion of value as of the lien date at issue and the board of review submitted four suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the board of review comparable sales which present dated sales as of the lien date at issue and/or present significantly smaller buildings with differing story heights than the subject property.

Thus on this limited record, the Board finds the best evidence of market value to be the appraisal submitted by the appellant which was not contradicted by recent market value evidence of

similar properties presented by the board of review. The subject's assessment reflects a market value of \$884,220 or \$203.69 per square foot of gross building area, including land, which is above the appraised value conclusion of \$800,000, including land.

The Board finds the subject property had a market value of \$800,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2).

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: _____

May 20, 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

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