



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

APPELLANT: Craig White
DOCKET NO.: 21-30314.001-R-1
PARCEL NO.: 17-07-105-026-0000

The parties of record before the Property Tax Appeal Board are Craig White, 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: \$17,568
IMPR.: \$78,432
TOTAL: \$96,000

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 two-story single-family dwelling of masonry, metal, and frame exterior construction with 2,246 square feet of above-grade living area. The dwelling was built in 2017 and is approximately 4 years old. Features of the home include a 90% finished basement containing 900 square feet,¹ 4½ bathrooms,² central air conditioning, a fireplace, and a two-car garage. The property has a 2,928 square foot site and is located in Arlington Heights, Wheeling Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

¹ For purposes of "living area," Cole added the above-grade and below grade finished areas for a combined "gross building area" of 3,146 square feet which was used sporadically in the report.

² The parties disagree on the bathroom count. The assessing officials report 3½ bathrooms which the appraiser reports are above-grade bathrooms. The appraiser further reports a full bathroom in the basement. Given the inspection and accompanying photos, the Board finds the appellant provided the best evidence of bathroom count.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal prepared by Ibi Cole, MAI and a Certified General Real Estate Appraiser, estimating the subject property had a market value of \$960,000 as of January 1, 2021.

At four different points in the appraisal, Cole wrote:

At the request of our client, (due to time constraint or other urgent matter) we have conducted a condensed/summarized appraisal. A great deal of information obtained, was taken from public record, owner and market participant interviews. The estimate of value arrived herein is relative in accuracy to the information obtained by public record and shall be considered within the realm of reason. This realm is based on similar public record transactions, recorded within a spectrum of time, commonly within six months to two years from the effective date of value.

(See cover letter page 1 and appraisal report, pages 1, 6, and 76, respectively).

The purpose of the appraisal was to establish the correct, as-is, fee simple, assessed valuation of the property for *ad valorem* tax purposes. The subject was inspected by Lulu Cole, a real estate analyst, on August 18, 2021.

Recognizing the newer construction status of the subject, appraiser Cole wrote the property “misses the opportunity for additional interior amenities as well as loses a considerable amount of floor area due to aesthetic appeal.” For instance, the stairs leading to the basement are exposed to the first level ceiling, diminishing floor area in the family room (supported by photographs on pages 51 and 56 of the appraisal). In addition, the basement is restricted to a recreation room, utility room, bedroom, full bathroom, and laundry room. The appraiser stated there were “no additional” lower-level amenities such as a fitness room, sauna and/or wine cellar which “are typical of some other newer constructed” area homes.

Deferred maintenance items were supported with photographs depicting interior defects described as “evidence of settlement” and moisture intrusion/leaking from skylight (Appraisal pages 56 & 57). Furthermore, exterior photos depict “mild rusting” at the base of a railing to the garage roof deck and “separating stone pavers.”

Under the cost approach, Cole estimated the subject had a site value of \$180,000 or approximately \$60.00 per square foot of land area.³ The appraiser used the Marshall Valuation Service Manual with a classification of “D Masonry Veneer Class ‘Type III’ residential single family home Building” in order to estimate the reproduction cost new of the improvements as \$995,340. Cole also wrote reproduction cost was used in order “to show the effects of functional obsolescence on the subject.” The appraiser estimated soft costs of 15% for entrepreneurial incentive along with legal and miscellaneous costs totaling an additional \$151,664, resulting in

³ Specifics of similar land sales were retained in the appraiser’s work file; the appraiser asserted the land value falls in line with the assessor’s land value conclusion. The subject’s 2021 land assessment is \$17,568 or \$175,680 for the site. [\$60 x 2,928 sq feet = \$17,568].

estimated total reproduction costs of \$1,147,003 or \$510.69 per square foot of living area. Next, the appraiser estimated the site improvements had a value of \$11,283, rounded, including a 15% entrepreneurial incentive, which resulted in total costs new of \$1,158,286.

Then, the appraiser deducted all forms of depreciation totaling \$352,081, resulting in a depreciated value of the improvements of approximately \$806,206 plus the land value of \$180,000. Adding the various components, including the land value, resulted in a value of the subject under the cost approach of \$986,205, which was rounded to \$990,000 or \$440.78 per square foot of above-grade living area, including land.

Using the sales comparison approach, Cole provided a map and two summary grids of 24 sales located within a .05-mile radius of the subject. The properties were described as comparable single-family homes with a "median home value" of \$1,190,000, rounded, and an average of \$1,180,000, rounded. Cole stated most of the comparables have at least 800 square feet of additional gross building area. As depicted on page 79, the appraiser reported ten sales, comparables #1, #3 through #6, #8, #9, #10, #12 and #13, were most heavily weighted in the analysis and properties located along West Huron Street (#5, #9 and #10) were also weighed more heavily.⁴

Thus the comparable sale parcels, given most weight, are improved with two-story or three-story single-family dwellings built from 2012 to 2020. These ten homes range in size from 3,189 to 4,419 gross building area and each has a full basement, eight of which are described as English style, along with 3½ bathrooms. Each comparable has either an attached or a detached garage. Comparables #3, #4, #5, #6, #8 and #13 sold from July 2020 to July 2021 for prices ranging from \$920,000 to \$1,195,000 or from \$288.49 to \$341.23 per square foot of gross building area, including land. From this data and performing analyses based on a per unit, per square foot and per bedroom sales price basis, Cole concluded that the subject would fall within the bracketed range, toward the lower-end, at \$950,000 or \$301.97 per square foot of gross building area, including land.

In reconciling the two value approaches, Cole gave dominant weight (70%) to the sales comparison approach to value with the remaining 30% attributed to the cost approach. Based on the foregoing, the appraiser's final opinion of value was \$960,000 or \$427.43 per square foot of above-grade living 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 \$109,085. The subject's assessment reflects a market value of \$1,090,850 or \$485.69 per square foot of above-grade living 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 contain either 2,928 or 2,952 square feet of land area and are improved with

⁴ Additional properties, although not given most weight, but located on West Huron Street are sales #14 through #17 and #21 through #24. (Appraisal, p. 78)

class 2-78 two-story single-family dwellings of frame or masonry exterior construction. The homes range in age from 3 to 10 years old and range in size from 2,137 to 2,562 square feet of above-grade living area. Each comparable has a full or partial basement with finished area, 3½ bathrooms, central air conditioning, and a two-car garage. Comparable #2 has a fireplace. The comparables sold from September 2018 to July 2019 for prices ranging from \$1,100,000 to \$1,335,000 or from \$507.42 to \$571.49 per square foot of above-grade living 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 occurring both 2018 and 2019, as compared to the lien date at issue of January 1, 2021, and the sales presented by the appellant's appraiser which occurred more proximate in time to the lien date at issue.

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 \$1,090,850 or \$485.69 per square foot of above-grade living area, including land, which is above the appraised value conclusion of \$960,000 or \$427.43 per square foot of above-grade living area, including land.

The Board finds the subject property had a market value of \$960,000 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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