



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

APPELLANT: Ronald de Vlam
DOCKET NO.: 21-30479.001-R-1
PARCEL NO.: 14-31-428-011-0000

The parties of record before the Property Tax Appeal Board are Ronald de Vlam, the appellant, by attorney Anthony Lewis, of the Law Offices of Gary H. Smith 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: \$18,725
IMPR.: \$111,410
TOTAL: \$130,135

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 2-story dwelling of masonry exterior construction with 3,258 square feet of living area.¹ The dwelling was constructed in 1890 and is approximately 131 years old. Features of the home include a basement with finished area, central air conditioning, a fireplace and a 1-car carport. The property has a 2,675 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-06 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 \$1,120,000 as of February 21, 2020. The appraisal was prepared by Todd R. Swanson, a

¹ The Board finds the best description of the subject was presented in the appellant's appraisal which includes a sketch of the subject, with dimensions, to support the subject's dwelling size.

Certified Residential Real Estate Appraiser in support of a refinancing transaction for the lender/client JPMorgan Private Bank.

In estimating the market value of the subject property, the appraiser developed the sales comparison and cost approaches to value.

For the comparable sales approach the appraiser selected eight comparable properties located from 0.07 to 0.43 of a mile from the subject property. The comparables have sites that range in size from 2,055 to 3,400 square feet of land area and are improved with 2-story or 3-story traditional dwellings of Q1, Q2 or Q3 quality and C2 or C3 condition ranging in size from 1,628 to 3,200 square feet of living area. The homes range in age from 26 to 132 years old. Six comparables have a basement with finished area and two comparables have no basement. Each dwelling has central air conditioning, seven homes have one or two fireplaces and seven properties have a 2-car garage. Seven of the comparables sold from August 2018 to September 2019 for prices ranging from \$900,000 to \$1,330,000 or from \$343.14 to \$552.83 per square foot of living area, land included. Comparable #7 has a list price of \$1,149,000 or \$468.41 per square foot of living area, land included. After adjusting comparable #2 for sale or financing concessions and comparable #7 for its active listing status, the appraiser adjusted the comparables for differences from the subject arriving at adjusted sale prices of the comparables ranging from \$1,033,670 to \$1,195,670 and an opinion of market value for the subject, under the comparable sales approach, of \$1,120,000.

In developing the cost approach to value, the appraiser opined the subject's site had a market value of \$525,000. The appraiser utilized a building cost website to determine the total replacement cost of the subject improvements of \$829,078, physical depreciation was estimated to total \$230,299 and the cost of the "As-Is" value of the site improvements of \$7,500. Adding the land value, replacement costs less depreciation and site improvements, the appraiser arrived at an indicated value for the subject, under the cost approach, of \$1,131,300, rounded.

In reconciling the two approaches to value, the appraiser stated the sales comparison approach is most heavily weighted as it best reflects typical actions of buyers and sellers and arrived at a final estimated opinion of market value for the subject of \$1,120,000. Based on this evidence, the appellant requested the subject's assessment be reduced to reflect the appraised value of the subject property when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$130,135. The subject's assessment reflects a market value of \$1,301,350 or \$399.43 per square foot of 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 comparables located within approximately ¼ of a mile from the subject property where three properties have a recent sale reported. Comparable #1 has no sale information and therefore shall not be further discussed or analyzed. Comparables #2, #3 and #4 have sites with 2,806 or 2,904 square feet of land area and are improved with 2-story dwellings of masonry or

frame and masonry exterior construction ranging in size from 2,640 to 3,212 square feet of living area. The homes range in age from 110 to 131 years old. Each comparable has a basement, two of which have finished area. Each dwelling has central air conditioning, two homes each have one fireplace and two comparables have a 2-car garage. The comparables sold from July 2019 to July 2021 for prices ranging from \$1,450,000 to \$1,632,500 or from \$505.40 to \$609.85 per square foot of living area, land included. Based on this evidence, the board of review requests the subject's assessment be confirmed.

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 appellant submitted an appraisal and the board of review submitted three comparable sales for the Board's consideration. The Board finds the date of valuation for the subject, as presented in the appraisal is February 2020 with the comparables utilized by the appraiser in having sale dates in 2018 or 2019, or from approximately 16 to 24 months prior to the January 1, 2021 assessment date. As a result, less weight is given to the opinion of value for the subject as presented in the appraisal. The Board also gives less weight to board of review comparable #4 which sold in 2019.

The Board finds the best evidence of market value to be board of review comparable sales #2 and #3 which sold closer to the assessment date at issue and are similar to the subject in location, age, design and other features. These two comparables sold in May and July 2021 for prices of \$1,450,000 and \$1,610,000 or \$505.40 and \$609.85 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,301,350 or \$399.43 per square foot of living area, including land, which falls below the two best comparable sales in the record. After considering adjustments to the comparables for differences with the subject, the Board finds a reduction in the subject's assessment is not 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

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

AGENCY

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