



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

APPELLANT: Deborah Nick
DOCKET NO.: 21-31489.001-R-1
PARCEL NO.: 14-19-420-009-0000

The parties of record before the Property Tax Appeal Board are Deborah Nick, the appellant, by attorney Katherine Amari O'Dell, of Amari & Locallo 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: \$39,062
IMPR.: \$16,938
TOTAL: \$56,000

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 1.5-story dwelling of frame exterior construction with 1,500 square feet of living area.¹ The dwelling was constructed in 1900 and is approximately 121 years old. Features of the home include a basement with finished area, central air conditioning, and a 2-car garage. The property has a 3,125 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The parties differ regarding the subject's design and dwelling size. The Board finds the subject is a 1.5-story home based on the photographs included in the appraisal. With regard to dwelling size, the Board finds the best evidence of dwelling size is found in the board of review's evidence as the sketch with measurements included in the appraisal did not account for the subject's 1.5-story design.

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 \$560,000 as of November 11, 2020. The appraisal was prepared by Renata Matczuk, a certified residential real estate appraiser, for a purchase transaction.

Under the sales comparison approach, the appraiser selected four comparable sales and two listings located from 0.39 of a mile to 1.44 miles from the subject. The parcels range in size from 3,100 to 3,150 square feet of land area and are improved with 2-story homes ranging in size from 1,302 to 2,500 square feet of living area. The dwellings range in age from 95 to 128 years old. Each home has a basement, five of which have finished area, central air conditioning, and a 2-car garage. Four comparables sold from January to June 2020 for prices ranging from \$490,000 to \$635,000 or from \$262.14 to \$376.34 per square foot of living area, including land. Two comparables were listed for \$599,000 and \$625,000 or \$300.70 and \$250.00 per square foot, respectively. The appraiser made adjustments to the comparables for differences from the subject to arrive at a value for the subject of \$560,000 as of November 11, 2020.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$56,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$70,352. The subject's assessment reflects a market value of \$703,520 or \$479.01 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 comparable sales, three of which are located within 0.25 of a mile from the subject and one comparable is described as located within the subject's subarea. The comparables are improved with 1-story or 1.5-story homes ranging in size from 1,020 to 1,794 per square foot of living area. The dwellings range in age from 123 to 134 years old. Three homes have a basement, one of which has finished area, and one home has a crawl space foundation. One home has a fireplace. The comparables sold from May 2020 to October 2021 for prices ranging from \$1,018,500 to \$2,483,884 or from \$567.73 to \$1,170.66 per square foot of 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.Adm.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.Adm.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 and the board of review submitted four comparable sales for the Board's consideration. The Board gives less weight to the value conclusion presented in

the appraisal as it misstates the subject's design and dwelling size, and thus, concludes a value based on erroneous adjustments to the comparables for design and dwelling size. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value and the Board will instead consider the raw sales data presented in the appraisal and by the board of review.

The record contains a total of eight comparable sales and two listings for the Board's consideration. The Board gives less weight to the two listings presented in the appraisal as they are less likely to be indicative of market value than a sale. The Board gives less weight to the appraisal sales #2 and #4, due to substantial differences from the subject in dwelling size, and to the board of review's comparables #1, #2, and #4, due to substantial differences from the subject in design or foundation type. The Board also gives less weight to the board of review's comparable #3, which sold for considerably more than the other sales in this record, indicating this sale may be an outlier.

The Board finds the best evidence of market value to be the appraisal sales #1 and #3, which sold proximate in time to the assessment date and are more similar to the subject in design, dwelling size, age, location, and most features, although one comparable lacks basement finish, suggesting an upward adjustment to this comparable would be needed to make it more equivalent to the subject. These two comparables sold for prices of \$490,000 and \$546,000 or \$376.34 and \$309.70 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$703,520 or \$479.01 per square foot of living area, including land, which is above the two best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, 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

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:

January 21, 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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