



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

APPELLANT: Karen Salmon
DOCKET NO.: 21-31518.001-R-1
PARCEL NO.: 14-17-305-004-0000

The parties of record before the Property Tax Appeal Board are Karen Salmon, the appellant, by Christopher B. Kaczynski, attorney-at-law of Smith Hemmesch Burke & Kaczynski 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: \$62,640
IMPR.: \$148,360
TOTAL: \$211,000

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 is improved with a three-story single-family dwelling of masonry exterior construction containing 5,023 square feet of living area. The dwelling was built in 2008 and is approximately 13 years old. Features of the property include a full basement with finished area, central air conditioning, two fireplaces, 5½ bathrooms, and a 2-car garage. The property has a 6,960 square foot site located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-09 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 \$2,110,000 as of January 1, 2021. The appraisal was prepared by David Conaghan, an Illinois Certified General Real Estate Appraiser, and Tom J. Boyle, Jr., an Illinois Associate Real Estate

Trainee Appraiser. The purpose of the appraisal was to develop an opinion regarding the market value of the fee simple interest of the subject property. The intended use of the report was for equitable ad valorem tax assessment purposes. The fee simple property rights were appraised. The appraisers determined the highest and best use as vacant is to hold the site for future development of a residential building. The highest and best used as improved was determined to be continuation of its present use as a single-family residential home. The appraisers reported the subject property was inspected on May 9, 2022, and the date of the report was May 17, 2022.

The appraisers described the subject property as being a 13-year-old, two-story part three-story, masonry constructed single family residential home with 5,023 square feet of above grade area. The home contains a total of ten above-grade rooms including a kitchen, dining room, living room, family room, office, laundry room, four bedrooms, four full bathrooms and one-half bathroom. The property has a full basement that is 90% finished with a recreation room, one bedroom, laundry room and one full bathroom.

The appraisers developed the sales comparison approach to value using five comparable sales improved with 2-story, 2.5-story or 3-story dwellings that range in size from 4,190 to 6,200 square feet of living area. The homes were built from 2004 to 2016. The comparables are described as having four or five bedrooms, three or four full bathrooms and one or two half-bathrooms. Each comparable also has a basement with finished area. These properties have sites ranging in size from 3,100 to 9,198 square feet of land area. The comparables are located in Chicago from between .39 and .83 miles from the subject property. The sales occurred from June 2019 to October 2020 for prices ranging from \$1,850,000 to \$2,250,000 or from \$354.84 to \$453.46 per square foot of living area, including land.

The appraisers compared the subject to the sale comparables in terms of size, age, condition, location, land to building ratio, market conditions, zoning, and other related factors. The appraisers adjusted the comparables for differences from the subject in dwelling size, lot size, bedroom count and bathroom count to arrive at adjusted prices ranging from \$361.94 to \$453.46 per square foot of living area, including land. The comparables had an adjusted mean price of \$409.07 per square foot of living area and an adjusted median price of \$420.83 per square foot of living area. The appraisers estimated the subject had an estimated value of \$420.00 per square foot of living area or \$2,110,000, rounded. Based on this evidence the appellant requested the subject's total assessment be reduced to \$211,000 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$284,154. The subject's assessment reflects a market value of \$2,841,540 or \$565.71 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%. The subject has an improvement assessment of \$221,514 or \$44.10 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on two comparables composed of class 2-09 properties improved with two-story dwellings of masonry exterior construction that have 5,024 and 6,510 square feet of living area and are 128 and 16 years old, respectively. Each comparable has a partial or full basement with finished area, central air conditioning, four full bathrooms, two half bathrooms, and a 3-car or a 4-car

garage. Comparable #1 has three fireplaces. These properties have sites with 8,050 and 6,250 square feet of land area, respectively. The comparables have the same assessment neighborhood code as the subject property and are located approximately ¼ of a mile from the subject property. Comparable #1 sold in January 2019 for a price of \$2,728,000 or \$542.99 per square foot of living area, including land. The comparables have total assessments of \$261,000 and \$267,000 and improvement assessments of \$188,550 and \$210,750 or \$37.53 and \$32.37 per square foot of living area, respectively.

In rebuttal the appellant's counsel argued that the board of review presented two "comparable properties" in its grid analysis, which did not satisfy the documentary evidence requirements contained in Section 1910.65 of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.65) requiring not less or not fewer than three comparable properties. Counsel further asserted the appellant did not make an equity analysis or a comparable sales analysis but presented an appraisal. The appellant further argued the board of review did not proffer any evidence or argument to challenge the facts or opinions contained in the appellant's appraisal report. The appellant also asserted that despite the board of review's irrelevant contention on equity and sales in response to the appellant's appeal, the board of review's own comparable properties prove that the subject property is over assessed.

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 Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appellant's narrative appraisal contained a detailed explanation of the appraisal process, a detailed description of the subject property, a detailed description of the comparable sales used by the appraisers, and a detailed description of the analysis of the comparable sales in relation to the subject property. The comparable sales used by the appraisers were similar to the subject in location, land area, age, style, size, and features. These properties sold proximate in time to the assessment date for prices ranging from \$1,850,000 to \$2,250,000 or from \$354.84 to \$453.46 per square foot of living area, including land. The appraisers adjusted the comparables for differences from the subject and arrived at an estimated market value of \$2,110,000 as of January 1, 2021. The board of review presented no evidence to challenge or refute any of the facts or opinions contained in the appellant's appraisal. The Board gives little weight to board of review comparable #1 that sold in January 2019 due to differences from the subject dwelling in age, being approximately 113 years older than the subject property. Little weight is given board of review comparable #2 as this property is an equity comparable which does not address the appellant's overvaluation argument.

The subject's assessment reflects a market value of \$2,841,540 which is above the appraised value presented by the appellant of \$2,110,000. Based on this record the Board finds the subject

property had a market value of \$2,110,000 as of the assessment date at issue and 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: _____

March 18, 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

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