



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

APPELLANT: Charles Keel
DOCKET NO.: 21-31730.001-R-1
PARCEL NO.: 14-28-115-008-0000

The parties of record before the Property Tax Appeal Board are Charles Keel, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$71,663
IMPR.: \$17,062
TOTAL: \$88,725

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, multi-family building of masonry exterior construction with 2,730 square feet of building area. The building is approximately 123 years old. Features of the building include a full basement and a 2.5-car garage. The property has a 4,095 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-11 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 information on four comparable sales located in the same assessment neighborhood as the subject. The comparables have sites ranging in size from 2,500 to 3,275 square feet of land area and are improved with class 2-11 multi-family buildings of masonry or frame and masonry exterior construction ranging in size from 2,612 to 3,360 square feet of

building area. The buildings range in age from 95 to 128 years old. Each comparable has a full basement and central air conditioning. Two comparables have either two or three fireplaces and three comparables have either a 1-car or a 2-car garage. The comparable properties sold from March to November 2021 for prices ranging from \$850,000 to \$1,050,000 or from \$252.98 to \$327.34 per square foot of building area, land included. Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$78,825 which would reflect a total market value of \$788,250 or \$288.74 per square foot of building area, land included, when applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$92,242. The subject's assessment reflects a market value of \$922,420 or \$337.88 per square foot of building area, land included, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The board of review did not provide any comparables in support of its contention of the correct assessment. The board of review asserted that limited comparable sales were available. Based on this evidence, the board of review requested 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant submitted four comparable sales for the Board's consideration with each sale occurring proximate in time to the subject's January 1, 2021 assessment date at issue. These four comparables are similar to the subject in location and age with varying degrees of similarity in dwelling size and other features. Comparables #1, #2, and #3 are over 22% larger buildings than the subject; each comparable has central air conditioning, which the subject lacks; and comparables #2 and #3 each have one or two fireplaces, a feature the subject lacks, suggesting downward adjustments would be required to make them more equivalent to the subject. Conversely, comparable #3 lacks a garage, which the subject features, suggesting an upward adjustment for this difference would be required for equivalency with the subject. Nevertheless, these properties sold for prices ranging from \$850,000 and \$1,050,000 or from \$252.98 to \$327.34 per square foot of building area, land included. The subject's assessment reflects a market value of \$922,420 or \$337.88 per square foot of building area, land included, which falls within the range established by the best comparables sales in this record on an overall market value basis but above the range on a price per square foot basis. However, based on the comparables' many superior attributes when compared to the subject; the subject's estimated market value, based on its assessment, is excessive. Based on the market value evidence in this record and after considering adjustments to the appellant's comparables for differences from the subject, the Board finds a reduction in the subject's assessment based on overvaluation 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Charles Keel, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld & Associates, LLC
40 Skokie Blvd
Suite 150
Northbrook, IL 60062

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602