



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

APPELLANT: 1028 N. Marshfield, LLC
DOCKET NO.: 21-32446.001-R-1
PARCEL NO.: 17-06-419-018-0000

The parties of record before the Property Tax Appeal Board are 1028 N. Marshfield, LLC, the appellant, by Katherine Amari O'Dell, attorney-at-law 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: \$22,750
IMPR.: \$88,250
TOTAL: \$111,000

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 3,250 square foot site improved with two buildings. The property has a three-story apartment building (Building A) and a two-story coach house (Building B) at the rear of the site.¹ Building A is a 131-year-old three-story with a partially finished basement, masonry constructed apartment building containing approximately 3,060 square feet of building area (including the basement finished area). Building A has three apartments including a five room, two-bedroom and 1½ bathroom “duplex-down” apartment and two four room, two-bedroom and one-bathroom apartments. Building B is a 121-year-old, two-story frame coach house containing 1,480 square feet (including basement finished area). Building B has a seven room, four-bedroom, three-bathroom duplex type apartment. Together the two buildings contain a total of 4,540 square feet of building area including the below grade

¹ For ease of understanding the Board has utilized the appellant’s appraisers’ nomenclature in describing the subject property as it is the best descriptive information in the record.

finished areas. The main building (Building A) duplex unit and the coach house (Building B) have central air conditioning with the remaining two units having window air conditioning units. The property is located in Chicago, West Chicago 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 an appraisal estimating the subject property had a market value of \$1,110,000 as of January 1, 2021. The appraisal was prepared by Beata P. Goczewski, an Illinois Certified General Real Estate Appraiser, along with Mitchell J. Perlow, MAI and an Illinois Certified General Real Estate Appraiser, who was the consulting or supervisory appraiser. The purpose of the appraisal was to provide an opinion of the market value of the real estate as of January 1, 2021, in order to establish an equitable ad valorem tax assessment. The property rights appraised were the fee simple estate. The appraisers indicated the property was inspected on September 2, 2022, and the report is dated December 20, 2022, as per the letter of transmittal. The appraisers determined the highest and best use of the subject as vacant is to improve the land for a use consistent with zoning and neighborhood characteristics and demand. The highest and best use as improved was determined to be the property's current use.

The appraisers indicated that Building A was built in 1890 and Building B, the coach house, was built in approximately 1900. At the time of inspection all the units were being leased. The appraisers described the subject as being in average overall condition with some signs of wear and tear but typical with other competing properties of similar age. In describing the basement areas, Building A has a full partially finished basement duplexed with the first-floor apartment and laundry and mechanicals; while the coach house, Building B, has a partial finished basement duplexed with the upper floor, and has a laundry and utility area. The appraisal contained numerous photographs depicting the subject property.

In estimating the market value of the subject property, the appraisers developed the sales comparison approach to value using six comparable sales. Each comparable is improved with a 2-story or 3-story apartment building of masonry exterior construction and has an additional one-story or two-story coach house of frame or masonry exterior construction. The comparables contained from 3,383 to 5,321 square feet of combined building area and were built from 1888 to 1906. The comparables have from four to six apartments with a variety of apartment mixes including from a one-bedroom/one-bathroom unit to a three-bedroom/two-bathroom unit. In their analysis the appraisers indicated the subject property has an average unit size of 1,135 square feet while the comparables have average unit sizes ranging from 798 to 1,330 square feet of living area. The sales occurred from January 2018 to December 2020 for prices ranging from \$835,000 to \$1,200,000 or from \$206.73 to \$250.57 per square foot of building area. The appraisers made qualitative adjustments to the comparables for such items as market condition-time, physical characteristics, and average unit size. The appraisers were of the opinion the subject had a value bracketed between \$240.00 and \$250.00 or \$245.00 per square foot of building area resulting in an estimated value of \$1,110,000, rounded.

Based on this evidence the appellant requested the subject's total assessment be reduced to \$111,000 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 \$133,177. The subject's assessment reflects a market value of \$1,331,770 when applying the level of assessment for class 2-11 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 completed the Comparable Sales/Assessment Grid Analysis on the "Board of Review Notes on Appeal." The board of review described the subject as being improved with a class 2-11 three-story multi-family building of masonry exterior construction with 2,622 square feet of building area that is 123 years old. The board of review indicated the features of the subject include a full unfinished basement and three bathrooms. As support for the assessment the board of review provided four comparables composed of class 2-11 properties improved with two-story or three-story buildings of masonry exterior construction that range in size from 2,366 to 3,246 square feet of building area. The buildings range in age from 119 to 143 years old. Three comparables have a full basement with two having finished area and one comparable has a slab foundation. The comparables have 2, 3 or 6 bathrooms. One comparable has central air conditioning and two comparables have a two-car garage. These properties have sites ranging in size from 2,472 to 3,200 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located approximately ¼ of a mile from the subject property. Comparables #1 and #4 are reported to have sold in August 2018 and February 2021, respectively, each for a price of \$1. Comparables #2 and #3 sold in February 2020 and June 2019 for prices of \$1,300,000 and \$756,298 or for \$400.49 and \$295.43 per square foot of building area, including land, respectively.

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 appraisal describes the subject as consisting of two buildings with a combined area of 4,540 square feet, which was supported by photographs of the improvements contained in the appraisal. The board of review evidence and analysis did not properly describe the subject improvements and did not indicate the property has two buildings, which detracts from the weight that can be given the board of review submission. Additionally, the appellant's appraisers developed the sales comparison approach to value using six sales, each of which was composed of two buildings, a two or three-story apartment building and an additional one or two-story coach house, similar to the subject property. The comparable sales used by the appraisers were also similar to the subject in age and had apartment mixes and apartment sizes similar to the subject property. The appellant's appraisers made qualitative adjustments to the comparables and estimated the subject property had a market value of \$245.00 per square foot or \$1,100,000 as of January 1, 2021. The appraised value presented by the appellant is below the market value reflected by the subject's assessment.

Conversely, the board of review analysis does not properly describe the improvements of the subject property, the board of review did not appear to use sales of multi-building properties as is the subject property, and the sales used by the board of review were dissimilar to the subject property in total building area. Additionally, two of the four sales presented by the board of review had purchase prices of \$1, which are not credible sales prices for improved properties.

Based on this evidence the Board finds a reduction in the subject's assessment commensurate with the appellant's request, which is based on the appraised value, 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: _____

June 17, 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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