



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

APPELLANT: Matthew Brown
DOCKET NO.: 21-35371.001-R-1
PARCEL NO.: 13-25-302-045-0000

The parties of record before the Property Tax Appeal Board are Matthew Brown, the appellant, by attorney Jeffrey G. Hertz, of Sarnoff Property Tax 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: \$15,625
IMPR.: \$128,375
TOTAL: \$144,000

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 3,125 square foot site that is improved with two buildings with a combined 2,904 square feet of building area.¹ Improvement #1 is a 2-story apartment building of masonry exterior construction with 2,220 square feet of building area that is approximately 122 years old. This building features an unfinished basement, one 2-bedroom/2-bathroom apartment, and one 3-bedroom/1-bathroom apartment. Improvement #2 is a 2-story building of masonry exterior construction with 1,367 square feet of building area. This building features a garage on the first floor and a 1-bedroom/1-bathroom apartment on the second floor. 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.

¹ All descriptive data regarding the subject was provided by the appellant or the appellant's appraisers as the board of review redacted all information about the subject in its submission.

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 \$800,000 as of January 1, 2021. The appraisal was prepared by Greg S. Fisher, an associate real estate trainee appraiser, Harry M. Fishman, a certified general real estate appraiser, and Mitchell J. Perlow, a certified general real estate appraiser, for ad valorem tax purposes.

Under the sales comparison approach, the appraisers selected six comparable sales depicted on a map in the appraisal as located relatively close in proximity to the subject. The parcels range in size from 3,150 to 4,970 square feet of land area and are improved with 2-story or 3-story apartment buildings of masonry exterior construction ranging in age from 13 to 127 years old. Comparable #5 also has a 1.5-story coach house. The comparables range in size from 2,880 to 4,350 square feet of total building area. Each comparable features a basement, three of which have finished area, and three apartment units. Four comparables have from a 1-car to a 3-car garage. The comparables sold from March 2019 to May 2021 for prices ranging from \$670,000 to \$1,245,000 or from \$214.33 to \$286.21 per square foot of building area, including land. The appraisers adjusted the comparables for conditions of sale, market conditions and differences from the subject to conclude a value for the subject of \$275.00 per square foot or \$800,000, rounded, as of January 1, 2021.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$144,000. The subject's assessment reflects a market value of \$1,440,000 or \$495.87 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 which are reported to be located within 0.25 of a mile from the subject. The parcels range in size from 3,528 to 4,687 square feet of land area and are improved with 2-story, class 2-11 buildings of masonry exterior construction ranging in size from 2,162 to 2,898 square feet of building area. The buildings range in age from 115 to 120 years old. The board of review did not report the number of units for each comparable but reported three comparables have 2 or 2.5 bathrooms and one comparable has 4 bathrooms. Each comparable has a basement, one of which is finished with a recreation room, and three comparables each have a 1-car or a 2-car garage. The comparables sold in April and August 2021 for prices ranging from \$1,249,000 to \$1,775,000 or from \$522.77 to \$644.05 per square foot of building area, including land. Based on this evidence the board of review requested the subject's assessment be sustained.

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 presented an appraisal and the board of review presented four comparable sales in support of their respective positions before the Board. The Board gave less weight to the appraised value conclusion as the appraisers selected two comparables that sold in 2019 when more recent sales were available, selected five comparables with substantially larger building sizes than the subject, and selected one comparable that is a significantly newer building than the subject. 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 ten comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #1, #2, #4, #5, and #6 and the board of review's comparable #3, due to substantial differences from the subject in building size and/or age. Moreover, the appraisal sales #5 and #6 sold less proximate in time to the assessment date than the other sales in this record.

The Board finds the best evidence of market value to be the appraisal sale #3 and the board of review's comparables #1, #2, and #4, which sold more proximate in time to the assessment date and are more similar to the subject in building size, age, location, site size, and some features. These comparables sold for prices ranging from \$670,000 to \$1,775,000 or from \$232.64 to \$644.05 per square foot of building area, including land. The subject's assessment reflects a market value of \$1,440,000 or \$495.87 per square foot of building area, including land, which is within the range established by the 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 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

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