



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

APPELLANT: Eddy 1248, LLC
DOCKET NO.: 21-36440.001-R-2
PARCEL NO.: 14-20-306-022-0000

The parties of record before the Property Tax Appeal Board are Eddy 1248, LLC, the appellant(s), by attorney Alan D. Skidelsky, of Skidelsky & Associates, P.C. 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: \$60,000
IMPR.: \$10,000
TOTAL: \$70,000

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 an approximately 106-year-old, multi-family, three-story, six-unit apartment building of masonry construction with 8,472 square feet of living area. The property sits on 7,320 square feet of land located in Chicago, Lake View Township, Cook County. Features of the building include a full unfinished basement, six full bathrooms and a two-car garage. The building has 3 three-bedroom units and 3 two-bedroom units. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted an appraisal estimating the subject property had a market value of \$700,000 as of January 1, 2021. The appraisal report was prepared by Thomas Grogan, a Certified Residential Real Estate Appraiser that holds an MAI designation.

The intended use of the appraisal was for an ad valorem tax appeal. Users of the report included the client, the client's legal counsel and governing bodies that oversee ad valorem taxation. The appraisers disclosed that the subject was constructed in approximately 1897 with subsequent updates and appeared to be in average condition for its age at the time of observation. Appraisers conclude that the subjects highest and best use is as its current use.

In estimating the market value of the subject property, the appraisers developed both the sales comparison approach and the income approach to value.

In applying the Sales Comparison Approach, the appraiser analyzed five multi-unit apartment building sales as comparable properties. While the exact proximity of each comparable to the subject was not specified, the appraiser confirmed that all were located on Chicago's north side, consistent with the subject's location, and noted that three required upward adjustments due to inferior locations. The comparable properties reflected site sizes ranging from 3,676 to 7,501 square feet, contained between five and eleven units of varying configurations, spanned ages from 57 to 139 years, and offered living areas between 3,106 and 7,655 square feet.

The appraiser reported that sales prices were adjusted to account for differences between the comparable properties and the subject. Adjustments were made for property rights conveyed, financing terms, conditions of sale, market trends, location, and physical characteristics. The appraisal employed qualitative descriptors such as "Superior" or "Inferior" to indicate relative differences, with corresponding upward or downward adjustments applied. Additionally, the appraiser utilized a price-per-unit metric to address variations in unit count and similarities in utility and build-out. Based on this analysis, the appraiser concluded a market value of \$145,000 per unit, resulting in an indicated total value of \$870,000 for the subject property.

The appraiser notes that the Income Capitalization Approach is predicated on the assumption that a typically informed purchaser would not pay more for a property than the present value of the future benefits anticipated from ownership. This approach requires estimating the subject property's potential net income by analyzing the operating performance of comparable properties. The estimated net income is then converted into an indication of value through an appropriate capitalization method. The reliability of this approach depends on the adequacy and accuracy of the market data utilized.

Applying this methodology, the appraiser selected eight comparable rental properties, with monthly rents ranging from \$1,295 to \$1,800 for two-bedroom and three-bedroom units. Based on this analysis, the appraiser concluded that the subject property's market rents would range from \$1,450 to \$1,750 per month, resulting in a potential gross income of \$115,200 annually. From this amount, the appraiser deducted an estimated vacancy and collection loss of 10% (\$11,520), yielding an effective gross income of \$103,680. Estimated operating expenses of \$28,976 were then deducted, producing a net operating income of \$74,704.

To determine the capitalization rate, the appraiser reviewed prevailing rates for multifamily properties and applied the band-of-investment method, arriving at a loaded capitalization rate of 8.73%. The subject property was described as an older, non-institutional grade apartment building in average condition. Based on the Income Capitalization Approach, the appraiser concluded an estimated value of \$860,000, rounded.

In reconciliation, the appraiser gave primary consideration in the final analysis to the income approach in concluding a market value for the subject of \$860,000 as of January 1, 2021.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$266,000. The subject's assessment reflects a market value of \$2,660,000 or \$313.98 per square foot of living area, including land, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on three comparable properties located within a ¼-miles radius from the subject property. None of the board of review's comparable properties were used by the appraiser in his comparable sales analysis. The comparable properties were improved with either a two or three-story class 2-11 dwelling. The comparable properties have sites that range in size from 2,300 to 3,000 square feet of land area and are improved with two or three-story class 2-11 dwellings of masonry construction that range in size from 2,364 to 6,300 square feet of living area. The dwellings are from 113 to 123 years old. Each comparable has a basement with either a finished or unfinished area, one has no garage while the other comparable properties have either a one or two-car garage. The comparable properties sold from May 2019 to October 2020 for prices ranging from \$650,000 to \$1,050,000 or from \$166.67 to \$288.71 per square foot of living area, land included. Based on this evidence the board of review requested the subject's assessment be confirmed.

Hearing

On January 28, 2025, Attorney Alan Skidelsky appeared on behalf of the Appellant LW East Series, LLC before the Property Tax Appeal Board for a hearing. Rachel Dickerson appeared on behalf of the board of review.

At the hearing, Mr. Skidelsky called Thomas W. Grogan, MAI, a State Certified General Real Estate Appraiser who testified, without objection, as an expert in the valuation of residential properties. Grogan testified that he authored the appraisal that appellant submitted into evidence in this appeal. He testified that he utilized both the income and sales comparison approaches to market value.

For the sales approach, the appraiser relied on five suggested sales comparable properties that sold between May 2018 and October 2021, for amounts ranging from \$565,000 to \$1,565,000, land included in the sale prices. The appraiser adjusted the sales prices to account for differences between the comparable properties and the subject. After applying the adjustments, the appraiser determined that the subject's value was \$120,000 per unit for a total market value of \$720,000.

Under the income approach, Mr. Grogan testified that since the subject consists of 3 two-bedroom units and 3 one-bedroom units he determined the market value for both of those separately by selecting local area comparable two- and three-bedroom properties and analyzing the rental income of those suggested comparable properties. Based on his analysis he determined a market rent of \$1,450 per month for the two-bedroom unit and \$1,750 per month for the three-bedroom unit. He determined a potential gross yearly income of \$115,200. After subtracting allowable expenses and replacement reserves, the appraiser arrived at the annual net operating income of \$74,704. Mr. Grogan determined a direct capitalization rate of 6.50 % using both local capitalization rates and market rates. A tax load of 2.23% was added to arrive at a loaded capitalization of 8.73%, multiplying the net operate income by the capital, by the capitalization rate he determined a market value of \$699,931 or \$700,000 rounded.

Mr. Grogan testified he gave primary consideration in the final analysis to the income approach in concluding a retrospective market value for the subject of \$700,000 as of January 1, 2021.

Ms. Dickerson rested on the board of review's previously submitted suggested comparable properties. No evidence challenging the subject description was offered by the board of review.

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 an appraisal, and the board of review submitted three comparable sales to support their respective positions.

The Board finds that the best evidence of the subject's market value is the appraisal submitted by the appellant. That appraisal employed both the income and the sales comparison approach to determine the subject's market value for the lien year in question. The appraisal was prepared by Thomas W. Grogan, an MAI designated appraiser and included adjustments based on the Grogan's experience and expertise, whereas the board of review submitted three comparable sales that contained unadjusted raw sales figures. The subject's assessment reflects a market value of \$2,660,000 or \$313.98 per square foot of living area, including land, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The Board finds the subject property had a market value of \$700,000 as of the assessment date at issue. Since market value has been established the 10% level of assessment for class 2-11 property under the Cook County Real Property Assessment Classification Ordinance shall apply.

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 20, 2026



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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