



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

APPELLANT: Kelsey Testa
DOCKET NO.: 21-36663.001-R-1
PARCEL NO.: 14-20-315-021-0000

The parties of record before the Property Tax Appeal Board are Kelsey Testa, the appellant, by attorney Ciarra J. Schmidt, of Schmidt Salzman & Moran, Ltd. 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: \$45,000
IMPR.: \$58,500
TOTAL: \$103,500

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 owner-occupied 2-story dwelling of frame exterior construction with 2,474 square feet of living area. The dwelling is approximately 108 years old. Features of the home include a slab foundation, central air conditioning and a 2-car garage. The property has a 3,000 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends both overvaluation and lack of assessment inequity as the bases of the appeal. As part of the overvaluation argument, the appellant completed in part Sec. IV – Recent Sale Data of the appeal petition reporting that the subject property was purchased by the appellant on March 19, 2020, for a price of \$1,035,000. The appellant further reported the property was purchased from James D. and Christine S. Shanahan, that the parties to the transaction were not related family members or corporate affiliates, the property was sold through a realtor with @Properties, and the property was advertised for a three-month period of

time. Furthermore, the property was not sold due to a foreclosure action. In further support of the recent sale, the appellant submitted a copy of the Settlement Statement reiterating the date of sale and sale price. Moreover, this document references commissions being distributed to two entities, namely, @Properties and Redfin Corporation. The appellant requested a reduced total assessment of \$88,616 which would reflect a market value of approximately \$886,160 or \$358.19 per square foot of living area, including land.

In support of the inequity argument, the appellant submitted information on five equity comparables along with property characteristics sheets which were used to update/correct foundation/basement finished and garage size. The comparables are located in the same neighborhood code as the subject. The comparables consist of class 2-06, 2-story dwellings of frame or frame and masonry exterior construction and which are 127 to 143 years old. The comparables range in size from 2,308 to 2,566 square feet of living area. Four comparables have full basements, two of which have finished area, and comparable #5 has a slab foundation. Four comparables have central air conditioning. One home has a fireplace and two comparables each have either a 2.5-car or a 3.5-car garage. The comparables have improvement assessments ranging from \$35,875 to \$48,348 or from \$15.54 to \$18.84 per square foot of living area. Based on this equity evidence, the appellant requested a reduced improvement assessment of \$43,616 or \$17.63 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$112,000. The subject's assessment reflects a market value of \$1,120,000 or \$452.71 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 property has an improvement assessment of \$67,000 or \$27.08 per square foot of living area.

In response to the appeal, the board of review submitted one grid analysis with both sales and equity data. The comparables are located within the same neighborhood code as the subject and the subarea or ¼ of a mile from the subject. The comparable lots range in size from 3,100 to 6,200 square feet of land area and are improved with class 2-06 2-story dwellings of frame or masonry exterior construction. The comparables range in size from 2,402 to 3,563 square feet of living area and range in age from 113 to 133 years old. Each comparable has a full basement, three with finished area, central air conditioning and from a 1-car to a 3-car garage. One comparable has one fireplace. The comparables sold from April 2019 to September 2021 for prices ranging from \$1,250,000 to \$1,837,500 or from \$503.22 to \$572.44 per square foot of living area, including land. As part of the data, the board of review reports that the subject property sold in April 2020 for a price of \$1,035,000 or \$418.35 per square foot of living area, including land. The four comparables have improvement assessments ranging from \$68,500 to \$122,000 or from \$27.42 to \$34.24 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment on both market value and equity grounds.

Conclusion of Law

The appellant contends, in part, that 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 on market value grounds.

The appellant supplied data related to the 2020 sale price of the subject property for \$1,035,000 and the board of review supplied four comparable sales, in support of the parties' respective positions before the Property Tax Appeal Board.

The Board finds the best evidence of market value to be the purchase of the subject property in March 2020 for a price of \$1,035,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant partially completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a realtor, the property had been advertised on the open market for three-months. In further support of the transaction the appellant submitted a copy of the settlement statement. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction and the comparable sales provided by the board of review do not overcome the weight to be given to the contemporaneous arm's length sale of the subject property in establishing the assessment for the year at issue. Additionally, the record contained four comparable sales for the Board's consideration. Less weight was given to board of review comparables due to their finished basements, a feature the subject lacks.

Based on this record the Board finds the subject property had a market value of \$1,035,000 as of January 1, 2021. Since market value has been determined the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. 86 Ill.Admin.Code §1910.50(c)(2)

Additionally, the taxpayer contends assessment inequity as another basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill. Admin. Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity, and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill. Admin. Code §1910.65(b).

The parties submitted nine equity comparables with varying degrees of similarity to the subject. The comparables have improvement assessments ranging from \$35,875 to \$122,000 or from \$15.54 to \$34.24 per square foot of living area. The Board finds the subject's improvement assessment as reduced herein of \$58,500 or \$23.65 per square foot of living area falls within the range established by the equity comparables in this record, and no further reduction in the subject's assessment is warranted given the reduction for market value considerations.

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

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:

February 17, 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

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

APPELLANT

Kelsey Testa, by attorney:
Ciarra Schmidt
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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