



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

APPELLANT: Karen Graham
DOCKET NO.: 21-37086.001-R-1
PARCEL NO.: 14-18-207-018-0000

The parties of record before the Property Tax Appeal Board are Karen Graham, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, 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 **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: \$64,440
IMPR.: \$43,560
TOTAL: \$108,000

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 2-story dwelling of masonry exterior construction with 2,498 square feet of living area.¹ The dwelling is approximately 128 years old. Features of the home include a basement and a 3.5-car garage. The property has a 7,160 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 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 \$650,000

¹ The parties differ regarding the subject's design and dwelling size. The appellant's appraisal includes a sketch of a 2-story home despite reporting the subject is a 2.5-story home. The parties differ in dwelling size by only 4 square feet of living area, which the Board finds to be an inconsequential difference in dwelling size.

as of January 1, 2021. The appraisal was prepared by Garry Nusinow, a certified general real estate appraiser, for ad valorem tax purposes.

The appraiser reported the subject backs to train tracks, has a view of train tracks and trains, and has a non-functioning fireplace. The appraiser reported the subject has central air conditioning but in the grid analysis of comparables and adjustments reported the subject does not have central air conditioning.² The appraiser noted homes in the subject's market area sold for an average lower price but higher median price from January 1, 2020 to January 1, 2021 than from January 1, 2019 to January 1, 2020 with similar marketing times for both periods.

Under the sales comparison approach, the appraiser selected five comparable sales located from less than 1 block to 1.04 miles from the subject. Four comparables are reported to back to train tracks but each comparable is reported as having residential view. The parcels range in size from 2,283 to 3,631 square feet of land area and are improved with bungalow, Cape Cod, 2.5-story, or 3-story homes of brick or frame exterior construction ranging in size from 1,606 to 2,737 square feet of living area. The dwellings range in age from 92 to 130 years old with comparables #2 and #4 reported to have been rehabbed. Each home has a basement with finished area. Four homes have central air conditioning, four homes each have a 1-car or a 2-car garage, and three homes each have a fireplace, one of which is reported to be non-functioning. The comparables sold from March 2019 to May 2020 for prices ranging from \$565,000 to \$965,000 or from \$337.78 to \$417.86 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject, including location and view, and for financing concessions to arrive at adjusted prices ranging from \$578,500 to \$788,500. Based on this analysis the appraiser concluded a value for the subject of \$650,000 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 \$108,000. The subject's assessment reflects a market value of \$1,080,000 or \$432.35 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 two comparable sales located within the same assessment neighborhood code as the subject.³ The comparables have 4,590 square foot sites that are improved with 2-story, class 2-06 homes of masonry or frame exterior construction with 2,452 and 2,922 square feet of living area. The dwellings are 120 or 123 years old. Each home has a basement. Comparable #2 has central air conditioning, a fireplace, and a 1-car garage. The comparables sold in July and November 2021 for prices of \$1,325,000 and \$1,300,000 or \$540.38 and \$444.90 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

² Based on these details, the Board finds the subject does not have central air conditioning or a fireplace.

³ The Board notes the board of review presented three comparables but reported sales data for only two of these comparables.

In written rebuttal, the appellant argued the board of review's unadjusted raw sales data does not overcome the appellant's appraisal. The appellant further argued the board of review's comparables differ from the subject in condition as their listing sheets depict renovated homes compared to the subject home in mostly original condition as reported in the appraisal.

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.Adm.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.Adm.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 two comparable sales for the Board's consideration. The Board gives less weight to the appraised value conclusion as four of five comparables are described as backing to train tracks like the subject but were adjusted negatively for location despite their similarity to the subject in described location; four of five comparables are substantially smaller homes than the subject requiring large adjustments for dwelling size; and no adjustments for design were made despite the varying designs of the comparables. 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 seven comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #1, #3, #4, and #5, due to significant differences from the subject in dwelling size.

The Board finds the best evidence of market value to be the appraisal sale #2 and the board of review's comparables, which sold relatively proximate to the assessment date and are more similar to the subject in design, dwelling size, age, and some features, although these comparables have smaller sites than the subject, and one comparable lacks a garage that is a feature of the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. However, these comparables are in better condition than the subject, as reported by the appraiser and demonstrated by the appellant in rebuttal; two homes have central air conditioning unlike the subject; two comparables are not close to train tracks like the subject; and one home has finished basement area unlike the subject, suggesting downward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables sold for prices ranging from \$965,000 to \$1,325,000 or from \$352.58 to \$540.38 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,080,000 or \$432.35 per square foot of living 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: _____

February 18, 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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