



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

APPELLANT: Kathrine Mack
DOCKET NO.: 21-37538.001-R-1
PARCEL NO.: 17-06-204-006-0000

The parties of record before the Property Tax Appeal Board are Kathrine Mack, the appellant; 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: \$19,200
IMPR.: \$69,036
TOTAL: \$88,236

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 multi-family building of masonry exterior construction with 3,420 square feet of building area. The dwelling is approximately 24 years old. Features of the home include a full basement with a finished apartment, central air conditioning, two fireplaces and a 2-car garage. The property has a 2,400 square foot site and 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 \$775,000 as of January 1, 2021. The appraisal was prepared by Thomas M. Collins, a Certified Residential Real Estate Appraiser. The intended use of the appraisal was to provide a retrospective opinion of market value as of January 1, 2021, for the purpose of determining uniformity of the

assessment and equitable taxes. The appraiser considered the subject property in average condition with some recent interior (Painting) decorating.

In estimating the market value of the subject property, the appraiser developed the income and sales comparison approaches to value. Under the income approach the appraiser arrived at an estimated market value of \$775,000.

Under the sales comparison approach, the appraiser utilized five comparable sales located from .17 to .91 of a mile from the subject property. The comparables have sites ranging in size from 2,280 to 3,125 square feet of land area and are improved with class 2-11, 2-flat or 3-flat buildings that range in size from 3,168 to 5,096 square feet of building area. The homes range in age from 27 to 143 years old. The comparables have features with varying degrees of similarity to the subject. The comparables sold from November 2018 to June 2019 for prices ranging from \$730,000 to \$880,000 or from \$158.70 to \$231.22 per square foot of building area, including land. After considering adjustments to the comparables for differences when compared to the subject, the appraiser arrived at an estimated market value of \$775,000 as of January 1, 2021. Based on this evidence, the appellant requested a reduction in the subject property's total assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$107,000. The subject's assessment reflects a market value of \$1,070,000 or \$312.87 per square foot of building 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 response to the appeal, the board of review noted the appraisal for \$775,000 was rejected due to 2018 sales and huge gap in age.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located with ¼ of a mile from the subject or on the same block. The comparables have sites with 2,280 or 2,400 square feet of land area and are improved with class 2-11, 2-story or 3-story buildings that range in size from 2,052 to 3,822 square feet of building area. The homes are 24 or 27 years old. The comparables have features with varying degrees of similarity to the subject. The comparables sold from March 2019 to February 2021 for prices ranging from \$810,123 to \$942,500 or from \$230.25 to \$459.31 per square foot of building area, including land.

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 based on the evidence in the record a reduction in the subject's assessment is warranted.

The record contains an appraisal submitted by the appellant and three comparable sales submitted by the board of review.

As to the appellant's appraisal, the Board finds the appraiser used three comparables (#1, #2 and #3) that sold over 3 years prior to the January 1, 2021 assessment date to establish the subject's market value. In addition, the appraiser used three comparables (#2, #3 and #4) that are over 100 years older than the subject and one comparable (#5) that is 49% larger in building size when sales more similar in age and building size were available. For these reasons, the Board gives less weight to the appraiser's conclusion of value.

As to the board of review comparables, the Board gives less weight to comparable #2 which is 60% smaller in building size when compared to the subject.

The Board finds the best evidence of market value to be board of review comparables #1 and #2 which overall are more similar to the subject in location, age, building size and features and sold more proximate in time to the assessment date at issue. These properties sold in March and December 2019 for prices of \$810,123 and \$880,000 or \$230.25 and \$286.16 per square foot of building area, including land. The subject's assessment reflects an estimated market value of \$1,070,000 or \$312.87 per square foot of living area, including land, which is above the best comparable sales in the record. After considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by the assessment is excessive and a reduction in the subject's assessment 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 18, 2024



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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