



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

APPELLANT: P & N ENT LLC
DOCKET NO.: 21-38576.001-R-1
PARCEL NO.: 14-28-108-029-0000

The parties of record before the Property Tax Appeal Board are P & N ENT LLC, the appellant, by attorney Douglas LaSota, of O'Keefe, Lyons & Hynes, LLC 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: \$61,540
IMPR.: \$95,960
TOTAL: \$157,500

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 a two-story dwelling of masonry exterior construction with 3,893 square feet of living area. The dwelling is approximately 136 years old. Features of the home include a full basement, two fireplaces, and a two-car garage. The property has a 6,154 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 \$1,575,000 as of January 1, 2021. The appraisal was prepared by Brian McNamara, a certified general real estate appraiser, for an ad valorem tax appeal. The appraiser developed the sales comparison approach to value by examining six comparable sales. The comparables are

improved with two-story or two to three-story dwellings ranging in size from 3,400 to 11,403 square feet of living area. The dwellings are 9 to 131 years old. Each comparable has central air conditioning and a full basement with finished area. Five comparables each have one to six fireplaces and four comparables each have either a two-car or four-car garage. The parcels range in size from 2,360 to 12,680 square feet of land area. The sales occurred from August 2020 to July 2021 for prices ranging from \$1,150,000 to \$1,700,000 or from \$201.70 to \$457.14 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for site size, dwelling size, bathroom count, and other features to arrive at adjusted prices ranging from \$1,250,000 to \$1,641,500. Based on this data, the appraiser arrived at a market value of \$1,575,000 or \$404.57 per square foot of living area, including land, as of January 1, 2021. Based on this evidence, the appellant requested a reduced assessment reflective of the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$178,991. The subject's assessment reflects a market value of \$1,789,910 or \$459.78 per square foot of living area, land included, when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located, two of which are located in the subject's assessment neighborhood. The comparables consist of two-story dwellings of masonry or stucco exterior construction ranging in size from 3,094 to 4,982 square feet of living area. The dwellings are 98 to 138 years old. Each dwelling has central air conditioning, one to four fireplaces, and a two-car garage. Three comparables each have a basement with finished area, and one comparable has a concrete slab foundation. The parcels range in size from 4,397 to 6,450 square feet of land area. The comparables sold from September 2018 to June 2020 for prices ranging from \$1,806,500 to \$2,800,000 or from \$455.06 to \$853.81 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 parties submitted an appraisal and four comparable sales to support their respective positions before the Property Tax Appeal Board. The Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$1,575,000 or \$404.57 per square foot of living area, including land, as of January 1, 2021. The appraisal was completed using comparable properties similar to the subject and contained appropriate adjustments to the comparable properties, which further advances the credibility of the report. The subject's assessment reflects a market value above the appraised value. The Board gives less weight to the comparable sales submitted by the board of review, one of which

differs from the subject in foundation, and three of which sold less proximate to the assessment date at issue than the sales used in the appraisal. Based on the evidence in this record, the Board finds 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

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: _____

March 18, 2025

Clerk of the Property Tax Appeal Board

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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