



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

APPELLANT: James Stevens Trust  
DOCKET NO.: 21-39422.001-R-1  
PARCEL NO.: 17-04-207-076-0000

The parties of record before the Property Tax Appeal Board are James Stevens Trust, the appellant, by attorney Katherine Amari O'Dell, of Amari & Locallo 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:** \$43,000  
**IMPR.:** \$43,300  
**TOTAL:** \$86,300

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 1,928 square feet of living area. The dwelling was built in 1964 and is approximately 57 years old. Features of the home include a basement with finished area, central air conditioning, and two fireplaces.<sup>1</sup> The property has a 1,720 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-95 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 \$863,000

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<sup>1</sup> The Board finds the best evidence of the subject's features is found in the appellant's appraisal where the appraiser inspected the subject property and the appraisal includes a sketch with measurements of the subject home.

as of August 10, 2021. The appraisal was prepared by Thomas Witt, a certified general real estate appraiser, for a refinance transaction.

Under the sales comparison approach, the appraiser selected four comparables located within 0.26 of a mile from the subject. The parcels range in size from 1,060 to 1,817 square feet of land area and are improved with rowhouses ranging in size from 1,928 to 2,624 square feet of living area. The dwellings range in age from 25 to 54 years old. Each comparable has central air conditioning. Three comparable have a basement with finished area and three comparables have a 1-car or a 2-car garage. Three comparables sold in May and July 2021 for prices ranging from \$860,000 to \$1,012,500 or from \$333.46 to \$458.98 per square foot of living area, including land. One comparable was listed for a price of \$839,000 or \$435.17 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject and adjusted the listing for lack of sale to arrive at adjusted prices from \$810,600 to \$873,300. Based on this analysis, the appraiser concluded a market value for the subject of \$863,000 as of August 10, 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 \$94,759. The subject's assessment reflects a market value of \$947,590 or \$491.49 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 three comparable sales<sup>2</sup> located within 0.25 of a mile from the subject. The parcels range in size from 1,040 to 1,214 square feet of land area and are improved with 3-story, class 2-95 home with 2,349 or 2,624 square feet of living area. The dwellings are 34 or 43 years old. Each home has a slab foundation, central air conditioning, one fireplace, and a 1-car or a 1.5-car garage. The comparables sold from January 2020 to August 2021 for prices ranging from \$950,000 to \$1,025,000 or from \$362.04 to \$436.36 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.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 met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant presented an appraisal and the board of review presented three comparable sales in support of their respective positions before the Board. The Board finds the best evidence of

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<sup>2</sup> Comparables #1 and #4 are the same sale.

market value to be the appraisal submitted by the appellant. The Board finds the appraiser selected comparables that are more similar to the subject than those presented by the board of review and the appraiser made appropriate adjustments to the comparables to arrive at a supported value conclusion. The subject's assessment reflects a market value of \$947,590 or \$491.49 per square foot of living area, including land, which is above the appraised value conclusion. The Board finds the subject property had a market value of \$863,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Adm.Code §1910.50(c)(2)).

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.

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Chairman

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Member

Member

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Member

Member

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Member

Member

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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

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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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