



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

APPELLANT: Scott Early  
DOCKET NO.: 21-46262.001-R-2  
PARCEL NO.: 14-33-407-040-0000

The parties of record before the Property Tax Appeal Board are Scott Early, 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:** \$75,000  
**IMPR.:** \$125,000  
**TOTAL:** \$200,000

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 frame exterior construction with 3,880 square feet of living area.<sup>1</sup> The dwelling is approximately 133 years old. Features of the home include a full unfinished basement, central air conditioning and a 1-car garage. The property has an approximately 6,000 square foot site and is located in Chicago, North Chicago Township, Cook County. The property is 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

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<sup>1</sup> The Board finds the best evidence of the subject's dwelling size was found in the appellant's appraisal which included a more detailed sketch with area calculations. Furthermore, the appraiser performed an interior and exterior inspection of the subject property.

\$1,050,000 as of January 1, 2021. The appraisal was prepared by Lilie Toshev, a Certified Residential Real Estate Appraiser. The property rights appraised were fee simple. The intended use of the retrospective appraisal was to estimate the market value of subject property for ad valorem. The appraiser considered the subject property was in good overall condition.

In estimating the value of the subject property, the appraiser developed the sales comparison approach to value. The appraiser provided four comparable sales that are located within .75 of a mile from the subject. The comparables have sites ranging in size from 945 to 2704 square feet of land area and are improved with Row House, Contemporary, or Victorian style dwellings of Brick, brick and frame or frame exterior construction ranging in size from 2,227 to 5,235 square feet of living. The dwellings are 55 to 142 years old and have full basements with finished area. Each comparable has central air conditioning and two or three full baths. Three comparables each have one or two half baths. Three comparables each have a 1-car or a 2-car garage. The comparables sold from April 2018 to May 2022 for prices ranging from \$1,003,000 to \$1,170,000 or from \$210.12 to \$472.15 per square foot of living 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 \$1,050,000 as of January 1, 2021. Based on this evidence, the appellant requested a reduction in the subject property's total assessment to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$246,302. The subject's assessment reflects a market value of \$2,463,020 or \$633.17 per square foot of living area, including land, when using 3,890 square feet of living area and 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 four comparable sales with the same assessment neighborhood code and property classification code as the subject, one of which is located on the same block as the subject. The comparables have sites with 2,100 or 3,000 square feet of land area and are improved with 2-story or 3-story dwellings of masonry or frame and masonry exterior construction ranging in size from 3,339 to 4,020 square feet of living area. The dwellings are 106 to 138 years old and have full basements with one having finished area. Each comparable has central air conditioning, two to six full baths and a 2-car garage. Two comparables have either one or two half baths. Three comparables each have one or four fireplaces. The comparables sold from February to December 2021 for prices ranging from \$1,550,000 to \$3,314,286 or from \$424.19 to \$824.45 per square foot of living area, including land. Based on this evidence the board of review requests confirmation of the subject's assessment.

In rebuttal submission, the appellant's counsel contends the best evidence of market value was the appellant's appraisal where the appraiser applied appropriate adjustments to the sales for differences from the subject. Conversely, the board of review provided unadjusted and undocumented sales comparables that should be accorded little weight by the Property Tax Appeal Board.

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

The record contains an appraisal submitted by the appellant and four comparable sales submitted by the board of review to support their respective positions before the Board. As to the appellant's appraisal, the Board gives less weight to the conclusion of value as the appraiser used two comparables that sold approximately 14 to 32 months prior to the to the January 1, 2021, assessment date and are less likely to be reflective of market value as of that date. In addition, all the comparables have significant differences in dwelling size (35% to 43%) and appraiser's comparable sale #3 is 81 years older when sales more similar in age and size were provided by the board of review. The Board further finds the appraiser's minimal adjustments for site size differences are highly suspect and not supported by any market value evidence. For these reasons, the Board gives less weight to the appraiser's conclusion of value.

The Board gives less weight to board of review comparable #1 which is 14% smaller than the subject and has finished basement area unlike the subject. The Board gives less weight to board of review comparable sale #2 which is considered an outlier as it sold significantly higher both on overall value and price per square than the other comparables submitted by the board of review. In addition, this comparable has six full bathrooms versus the subject's three full baths.

The Board finds the best evidence of market value to be board of review comparables #3 and #4 which sold more proximate in time to the assessment date at issue and are more similar to the subject dwelling in age, size and most features. However, upward adjustments to the comparables would have to be considered for their significantly smaller lot sizes (50% or 65%) when compared to the subject. Nevertheless, these properties sold in October and December 2021 for prices of \$1,550,000 and \$1,800,000 or for \$424.19 and \$477.71 per square foot of living area, including land. The subject's assessment reflects an estimated market value of \$2,463,020 or \$633.17 per square foot of living area, including land, which is higher than the best comparable sales in the record. After considering adjustments to the best comparable sales for differences in site size 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: \_\_\_\_\_

April 15, 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

AGENCY

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