



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

APPELLANT: Skyriver Michigan
DOCKET NO.: 21-49500.001-C-2
PARCEL NO.: 17-27-102-002-0000

The parties of record before the Property Tax Appeal Board are Skyriver Michigan, the appellant(s), by attorney Paul K. Lee, of The Law Office of Paul K. Lee 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: \$100,325
IMPR.: \$399,675
TOTAL: \$500,000

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 is improved with a 106-year-old, four-story, mixed-use office building, of masonry and glass construction containing 31,644 square feet of gross building area. The subject is located on a 7,984 square foot site. The property is in Chicago, South Township, and is a Class 5-92 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends that overvaluation is the basis of the appeal. In support of this argument, the appellant submitted an appraisal estimating the subject property had a market value of \$2,000,000 as of January 1, 2021.

The board of review submitted its "Board of Review Notes on Appeal," disclosing the total assessment for the subject of \$700,000. The subject's assessment reflects a market value of

\$1,969,228 when applying the 2021 level of assessment of 25.00% for Class 5 property 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 sales comparables. The purchase prices ranged from \$1,854,000 to \$4,090,000, or \$121.65 to \$238.54 per square foot of building area. The sales occurred between March 2021 and August 2023.

Appellant's appraisal report, evidence, and hearing testimony

Cole Consulting of Appraisal Development, Incorporated, prepared an appraisal of the subject for *ad valorem* tax purposes in support of the appellant's appeal. They developed a valuation by the sales comparison and income approaches, but not the cost capitalization approach. Ibi Cole was qualified at the hearing as an expert in the theory and practice of real estate appraisal.

The subject site is located along the east side of South Michigan Avenue, between East Cermak Road to the north and East 23rd Street to the south. By standards of local and comparable market characteristics, we consider this an average commercial location along a secondary thoroughfare, also known as Motor Row, a Historic Landmark District. The surrounding improvements are a mix of commercial and residential improvements. Much of the area is comprised of mid- and high-rise residential and/or mixed-use developments. Focused north and south along South Michigan Avenue and east and west along Cermak Road are several local restaurant and retail users, while tourist attractions such as Soldier Field, The Field Museum, Shedd Aquarium, and Adler Planetarium are concentrated to the northeast. Lake Michigan is less than 0.7- miles to the east, with the interchange for the Stevenson Expressway (Interstate 55) and the Dan Ryan Expressway (Interstate 90/94) approximately 0.5 miles to the southwest. Overall, this is a high-density area with access to linkages, transportation, entertainment, and shopping. Overall, this is a high-density area with average commercial draw.

On direct examination, Cole testified that the four sales are superior and required downward adjustment. Comparables one and four were overall inferior to the subject and needed upward adjustments. Comparable two represents the height of the market at \$120.83 per square foot, while sale four indicates the bottom of the market range at \$22.86 per square foot. Cole stated comparable four is also located on Motor Row; however, considering its high vacancy and poor condition at the time of sale, the subject would fall well above this sale. Additionally, Cole gave less weight to sale three's overall superiority, as it appears to be an outlier when considering its central location in the Loop. She further stated that, accordingly, a sale price per square foot above comparable three and below comparable two would be more probable to anticipate from the market. After adjusting these properties for various key property characteristics, Cole concluded the subject property had a value of \$61.00 per square foot of gross building area, or \$1.8 million total value.

Under the income approach, the appraiser analyzed six commercial comparables to arrive at a blended rental rate of \$15.75 per square foot for a potential gross income of \$478,704. The appraiser applied for a vacancy and collection rate of 13% to arrive at an effective gross income of \$572,044. Expenses were estimated at \$127,486, resulting in a net operating income (NOI) of \$444,558.

The appraiser testified she used immediate area market surveys, the band of investment, and overall national market surveys when capitalizing the NOI. She opined a capitalization rate of 9%, which she then loaded to 14.57%, accounting for the taxes. This resulted in an estimate of value under the income approach to value of \$3,050,000, rounded.

On cross-examination, the board of review representative, Ms. De La O, stated the board of review believes that comparable two was similar in size after an adjustment for location and age on that comparable, and deducting the lease-up costs, they believe \$81 a square foot is fair for the property.

The board of review did not provide further evidence in their case-in-chief other than the statement made and the comparable sales submitted into evidence.

On cross-examination of the board of review, Ms. De La O testified that she did not prepare the evidence submitted by the board of review. The appellant then requested that the Board give no weight to the evidence submitted by the board of review, as it is hearsay. The Administrative Law Judge presiding over the hearing reserved ruling on the appellant's hearsay objection.

In the closing argument, the appellant stated that when the market value of the property is the basis of the appeal, the value of the property must be proven by a preponderance of the evidence. In this case, the appellant has provided an appraisal report for the subject property, which concludes that the fair market value is \$2 million. The appellant further stated that the subject property is in shell condition with landmark status and no parking spaces. Additionally, the subject property has been vacant for ten years and five years since the appellant's purchase, even though the appellant has tirelessly tried to lease or sell the subject property. The appellant stated the appraisal report submitted by the appellant is clearly the best and only evidence of value presented in this record. The report establishes by a preponderance of the evidence that the current assessment is excessive and that correct value of the property is \$2 million, which supports a revised assessment of \$500,000. The appellant requests that the Property Tax Appeal Board set the 2021 assessment at \$500,000. The board of review rested on the evidence.

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 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 has met this burden of proof, and a reduction in the assessment of the subject is warranted.

The appellant made a hearsay objection to the board of review's evidence. The Board overrules the appellant's hearsay objection because the comparable sales and the notes on appeal submitted by the board of review are evidence in the record.

The Board considers the weight and credibility of the documentary and testimonial evidence, and of the arguments made. The best evidence of market value is the appraisal submitted by the

appellant. The Board finds the subject property had a market value of \$2,00,000 with a taxable assessed value of \$500,000 as of the assessment date at issue. Since market value has been established, the 2021 level of assessment of 25.00% for Class 5 property under the Cook County Real Property Assessment Classification Ordinance shall apply.

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: _____

October 20, 2026



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 9-215 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Skyriver Michigan, by attorney:
Paul K. Lee
The Law Office of Paul K. Lee
33 N. Dearborn St.
10th Floor
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602