



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

APPELLANT: Jennifer Herbert
DOCKET NO.: 21-49818.001-R-1 through 21-49818.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board (PTAB) are Jennifer Herbert, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, PTAB hereby finds **A Reduction** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-49818.001-R-1	13-14-332-045-1001	6,317	39,866	\$46,183
21-49818.002-R-1	13-14-332-045-1005	521	3,286	\$3,807

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision 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

A 2,632 square feet, two-story unit in a multi-unit building located in Chicago, Jefferson Township, Cook County comprises the subject property. The one-year-old property featured three bathrooms, a one-car garage, and air conditioning. The owner-occupied property sold in March 2021 for \$499,900 after a realtor advertised the property on multiple listing services for five months.¹ The transaction did not occur between related parties and was not due to a foreclosure action or pursuant to a contract for deed. The appellant contends the subject assessment overvalued the property.²

¹ The appellant listed the transaction closing date as March 2022 in Section IV of the petition, which is inconsistent with the attached final settlement statement and purchase agreement. The Property Tax Appeal Board (PTAB) concludes the transaction closed in March 2021.

² The petition indicates that the appeal is also based on a contention of law, but the appellant did not appear to make substantive arguments or present evidence to that effect independent of the equity basis of appeal.

The appellant seeks to prove overvaluation with a recent sale and appraisal. As evidence of overvaluation, the appellant first attached a copy of the final settlement statement and condominium purchase agreement indicating the subject sold in March 2021 for \$499,900 to borrowers Jennifer Herbert and Jack Herbert.

To underscore the position that the assessment overstated the subject's market value, the appellant submitted an appraisal that opined the market valued the subject at approximately \$500,000 as of February 1, 2021. The appraisal used only the sales comparison approach. The appraiser relied on five sales of suggested comparables within .66 miles of the subject property for amounts ranging from \$499,900 to \$525,000, or between \$189.93 and \$194.44 per square foot. The appraiser adjusted the sales prices to account for differences between the comparables and the subject.

The county board of review responded in its "Notes on Appeal" that the two property identification numbers (PINs) of the subject were correctly assessed at \$61,323. Though the board of review suggested there was an attachment for the two PINs, PTAB did not discern an attachment or any evidence submitted by the board of review in defense of its position, which the appellant underscored in rebuttal.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessment for property tax purposes. When market value is the basis of the appeal, appellants must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). Proof of market value may consist of a recent sale or appraisal of the subject property, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant met this burden of proof and a reduction in the subject's assessment is justified.

In this record, the best evidence of market value resides in the recent sale information submitted by the appellant. The attached settlement statement confirmed that the subject property sold in March 2021 for \$499,900. While the appellant also submitted an appraisal, an appraiser's opinion, without more, is not as persuasive an indicator of a particular unit's market value as a sale of the instant unit within two years of the assessment date. Furthermore, because the county board of review neglected to submit any evidence supporting the subject assessment, PTAB finds the appellant credibly established the market valued the subject at approximately \$499,900 in 2021. Given that class two residential properties are assessed at 10% of market value, the \$61,323 total subject assessment for both property identification numbers reflects a market value of \$613,230, which exceeds the value established in this record. As such, PTAB finds the appellant showed subject assessment overvaluation by a preponderance of the evidence and the proper subject assessment based on the appellant's evidence is \$49,990.

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 21, 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 9-125 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

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

APPELLANT

Jennifer Herbert, by attorney:
Stephanie Park
Park & Longstreet, P.C.
1620 W Colonial Pkwy.
Inverness, IL 60067

COUNTY

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