FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Candace Swetz
DOCKET NO.: 21-50083.001-R-1
PARCEL NO.: 13-13-226-024-0000

The parties of record before the Property Tax Appeal Board are Candace Swetz, the appellant, by attorney Anthony Lewis, of the Law Offices of Gary H. Smith 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 ***No Change*** 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:	$9,000
IMPR.:	$58,346
TOTAL:	$67,346

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 apartment building of masonry exterior construction with 2,983 square feet of gross building area.[1] The building is 97 years old and has an effective age of 30 years. Features of the building include a full basement and a 2-car garage. The property has a 3,760 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 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 $550,000 as of January 1, 2021. The appraisal was prepared by Kurt Wessel, a certified residential

[1] The Board finds the best description of the subject is found in the appraisal report submitted by the appellant, which contains a detailed property sketch with measurements.

appraiser. The purpose of the appraisal was to determine market value of the subject for a tax appeal.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach by examining four comparable sales within 1.47 mile of the subject. The comparables are improved with two-story apartment buildings ranging in size from 2,304 to 4,432 square feet of gross building area. The buildings are 91 to 106 years old. Each comparable has a full basement and either a 1-car or 2-car garage. One comparable has central air conditioning. The parcels range in size from 3,750 to 7,500 square feet of land area. The sales occurred from April to September 2020 for prices ranging from $500,000 to $675,000 or from $152.30 to $227.86 per square foot of gross building area, including land. Adjustments were applied for differences between the comparables and the subject property for financing concessions, site size, and building size to arrive at adjusted prices ranging from $525,260 to $584,800. Based on this data, the appraiser arrived at a market value of $550,000 or $184.38 per square foot of gross building 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 $67,346. The subject's assessment reflects a market value of $673,460 or $225.77 per square foot of gross building 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 within .25 of a mile of the subject. The comparables consist of two-story class 2-11 buildings of masonry exterior construction ranging in size from 2,530 to 2,726 square feet of gross building area. The buildings are 105 to 112 years old. Each building has a full basement, one of which has finished area, and either a 1.5-car or 2-car garage. The parcels range in size from 3,600 to 3,780 square feet of land area. The comparables sold from May 2020 to September 2021 for prices ranging from $724,700 to $909,000 or from $265.85 to $343.02 per square foot of gross building 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant submitted an appraisal and the board of review submitted four comparable sales for the Board’s consideration. The Board gives less weight to the value conclusion in the appraisal; although the appraiser stated that “the subject is located in a neighborhood and market area where there is limited recent market data of 2-unit buildings similar to the subject property available for comparison,” the record reveals sales within .25 of a mile of the subject submitted by the board of review that were not considered by the appraiser. The Board will instead examine the raw sales submitted by the parties.

The Board gives reduced weight to appraisal comparable #4, which differs from the subject in site size, building size, and location. The Board also gives diminished weight to board of review comparable #4, which features finished basement area unlike the subject.

The Board finds the best evidence of market value to be appraisal comparables #1 through #3 and board of review comparables #1 through #3, which are similar to the subject in age, location, building size, and features. The comparables sold for prices ranging from $500,000 to $797,450 or from $202.92 to $314.95 per square foot of gross building area, including land. The subject's assessment reflects a market value of $673,460 or $225.77 per square foot of gross building area, including land, which is within the range established by the best comparable sales in the record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not 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:

C E R T I F I C A T I O N

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: February 18, 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

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