



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

APPELLANT: MK Construction & Builders, Inc.  
DOCKET NO.: 21-53608.001-R-1  
PARCEL NO.: 13-14-418-033-0000

The parties of record before the Property Tax Appeal Board are MK Construction & Builders, Inc., the appellant(s), by attorney Jennifer Kanik, of the Law Offices of Terrence Kennedy Jr. 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:** \$14,594  
**IMPR.:** \$7,605  
**TOTAL:** \$22,199

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 123-year-old, two-story, building of frame exterior construction. It contains 1,985 square feet of gross building area. Features of the subject include a full finished basement and central air conditioning. The property is situated on 3,150 square feet of land in the City of Chicago, Jefferson Township, Cook County. The subject is classified as a Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted a settlement statement that disclosed the subject property was purchased on September 11, 2020, for \$232,500. The subject's sale price reflects a market value of \$117.13 per square

foot of gross building area including land. The appellant provided information in Section IV—Recent Sale Data of the Residential Appeal that the subject was not transferred between related parties; was advertised and sold by a realtor; was not sold due to a foreclosure.

The appellant also raised recent construction as a basis of appeal. In support of this issue, the appellant submitted a brief in which it argued the subject property was vacant and rendered uninhabitable due to construction. The appellant disclosed in the brief that the subject property received a final inspection approval on September 1, 2021. The subject property was occupied on September 28, 2021, for a total of 270 days of vacancy in 2021, or 74% of the calendar year 2021. Hence, the appellant requested an assessment reduction with a 26% occupancy factor. The appellant submitted a demolition permit with the date of October 27, 2020; a four-page building permit and inspection report from the City of Chicago that disclosed final inspection was passed on September 1, 2021; a two-page vacancy/occupancy affidavit filed with the Cook County Assessor. The appellant requested a reduction of the improvement assessment to \$7,605 to reflect a 26% occupancy factor; a land assessment of \$14,594, which was unchanged from the board of review's assessment; a total assessment of \$22,199. Nevertheless, the appellant requested a reduction in the subject's assessment to \$14,000 on the Petition.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$43,845. The subject's assessment reflects a market value of \$438,450, or \$220.88 per square foot when applying the 2021 level of assessment of 10.00% for Class 2 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 suggested comparable sales.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the 2021 assessment reduced by a 26% occupancy factor for the improvement assessment. The appellant submitted evidence to establish vacancy due to recent construction. That evidence consisted largely of the demolition permit and the building permit/inspection report. The Board finds the improvement assessment of \$29,251 shall be reduced by a 26% occupancy factor to \$7,605. The land assessment shall remain unchanged. The total assessment is reduced to \$22,199 for the 2021 lien year.

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: \_\_\_\_\_

June 17, 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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