



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

APPELLANT: John Rhoton
DOCKET NO.: 21-55135.001-R-1
PARCEL NO.: 13-13-213-020-0000

The parties of record before the Property Tax Appeal Board are John Rhoton, the appellant(s), by attorney Richard D. Worsek, of Worsek & Vihon LLP 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: \$8,640
IMPR.: \$36,860
TOTAL: \$45,500

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 three-story multi-unit dwelling of masonry construction with 3,471¹ square feet of living area. The dwelling is approximately 106 years old. Features of the building include a full basement and a two-car garage. The property has a 3,600 square foot site and is located in Chicago, Jefferson Township, Cook County. The property is a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The board of review listed the subject property as having 4,290 square feet of building area. The appraisal report lists 3,471 square feet of building space. The Board finds that the building had 3,471 square feet of building space as represented in the appraisal report. The Board finds that as to the square footage, the appraisal is the best evidence as it was recorded by a certified appraiser who conducted a site visit. There is no indication that a representative from the board of review had personal knowledge of the subject property.

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 \$455,000 as of January 1, 2021. The appraiser was a Certified General Real Estate Appraiser with a CIAO designation who conducted a visit to and inspection of the subject property on September 20, 2021. Appellant disclosed that this is not an owner-occupied residence.

The appraiser determined the subject's highest and best use as improved was its current use. The appraiser used the income capitalization and sales comparison approaches to value.

Under the income capitalization approach, the appraiser analyzed four comparable rentals located an undisclosed distance from the subject property. Considering the data from the rental comparable properties, the appraiser estimated an average rent for one unit in the four unit building of \$1,600 per month, which produces a total potential gross income of \$57,600. The appraiser stabilized the vacancy rate at 5.0% for an effective gross income (EGI) of \$54,720. Expenses were then deducted to arrive at a net operating income (NOI) of \$42,354. Next, the appraiser calculated the overall capitalization rate of 7.50% utilizing the direct capitalization technique and the mortgage-equity technique. Adding the tax load for the vacancy rate, the appraiser arrived at the final capitalization rate of 9.73%. Dividing the NOI of \$42,354 by the capitalization rate of 9.73%, the appraiser arrived at a value under the income approach of \$435,000, rounded.

Under the sales comparison approach, the appraiser utilized five comparable sales located within a 0.76-mile radius of the subject. The comparable properties' sites ranged in size from 2,483 to 3,781 square feet of land area and from 2,892 to 6,498 square feet of living area. The properties are each improved with a multi-unit apartment building of masonry construction that each have three units that were built from 1913 to 1925. The comparable properties sold from October 2019 to February 2021 for prices ranging from \$475,000 to \$618,000 or from \$87.72 to \$164.51 per square foot of living area, land included in the sales price. The appraiser then adjusted for market conditions, land-to-building ratio, and unit mix/unit size. The appraiser concluded that based on the sales data and applying adjustments to the comparable sales for differences from the subject, the subject had a market value of \$470,000, rounded.

The appraiser gave equal weight to each approach utilized when reconciling the valuations derived from the two approaches to valuation to arrive at the value conclusion for the subject property of \$455,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$74,277. The subject's assessment reflects a market value of \$742,770 or \$213.99 per square foot of living area, including land, when applying the level of assessments for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted four class 2-11 equity comparable properties with varying degrees of similarities to the subject which are located within a ¼-mile radius of the subject. The improvements ranged in age from 105 to 109 years and in size from 4,206 to 4,290 square feet of living area. Based on this information the board of review requested confirmation of the subject's assessment.

The matter proceeded to hearing on January 29, 2026, via the WebEx platform. Present at the hearing were Angel Carpio, attorney for the appellant, Rachel Dickerson, representative for the Cook County board of review, and David Conaghan, witness for the appellant. Rachel Dickerson and David Conaghan were sworn in as witnesses. At hearing, appellant Attorney Carpio presented certified appraiser David Conaghan, a certified general real estate appraiser with a CIAO designation, who testified to the findings and conclusions made by the appraiser as to the market value of the subject property. Mr. Conaghan has been a licensed appraiser since 2000 and works at the PJC Group Appraisal firm. Mr. Carpio sought to qualify Mr. Conaghan as an expert in real estate appraisal. Ms. Dickerson had no objection, and Mr. Conaghan was qualified as an expert in the theory and practice of real estate appraisal. The appraiser testified as to his use of the income capitalization approach and sales comparison approach to arrive at market value. The appraiser stated that he adjusted the value of comparable properties based on various factors. The appraiser carried out a reconciliation of the approaches to valuation.

The board of review representative questioned the appraiser about the difference between the square feet of living area as indicated by the assessor, 4,290 square feet, and that offered by the appraiser, 3,471 square feet. The appraiser related that the improvement was measured with a laser device to determine square feet of living area, and he was confident in that result. The board of review also questioned the comparables chosen by the appraiser as comparables #2, #3, and #4 were larger in square feet of living area than the subject. The appraiser related that adjustments were made for differences between the comparables and the subject.

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 appraisal submitted by the appellant. The Board finds the appellant submitted a credible appraisal report with reasonable and logical adjustments for differences from the subject. The board of review's evidence consists of unadjusted raw data concerning four comparable properties that lack any meaningful data for comparison to the subject property. The subject's assessment reflects a market value above the best evidence of market value in the record. The Board finds the subject property had a market value of \$455,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2)).

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

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