FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Rebecca Johnston
DOCKET NO.: 21-56689.001-R-1 through 21-56689.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Rebecca Johnston, the appellant(s), by attorney Max E. Callahan, of Siegel & Callahan, P.C. 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-56689.001-R-1	14-32-102-041-0000	40,000	0	$40,000
21-56689.002-R-1	14-32-102-049-0000	58,400	101,600	$160,000

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 consists of a two-story detached single-family residence of masonry construction with 3,892 square feet of living area. The dwelling is approximately 22 years old. The record demonstrates that the subject property consists of two contiguous parcels, identified as PINs 14-32-102-041-0000 and 14-32-102-049-0000. The Board of Review and the appellant each submitted assessment breakdowns indicating that PIN 14-32-102-041-0000 is assessed solely for land, with no improvement assessment assigned, whereas PIN 14-32-102-049-0000 contains both the land and the full improvement assessment. Features of the residence include a full basement with a formal recreation room, central air conditioning, a fireplace, four bedrooms, three full bathrooms, one half-bathroom, and an attached three-car garage. The property has a 7,875 square-foot site located in the city of Chicago, within North Chicago Township, Cook County.

The appellant contends that the subject property is overvalued. In support of this position, the appellant submitted a written appraisal estimating the market value of the subject at $2,000,000 as of January 1, 2021.

The appraisal was prepared by Gary J. Wydra, a Certified Residential Real Estate Appraiser with City Wide Appraisal Services, Inc., who stated that the appraisal was intended solely for ad valorem tax assessment purposes. The appraiser personally inspected both the interior and exterior of the subject property and concluded that the dwelling was a contemporary masonry, two-story single-family residence containing 3,892 square feet of gross living area above grade, situated on a 7,875-square-foot site.

In developing his opinion of value, the appraiser relied upon the sales comparison approach. He analyzed three comparable sales; each located within the subject's Lincoln Park market area at distances ranging from approximately 0.14 to 0.58 miles from the subject property. These comparables were improved with two-story masonry dwellings ranging in age from 17 to 20 years and containing between 3,647 and 3,933 square feet of living area. The properties sold in 2020 for prices ranging from $1,875,000 to $2,000,000, including land. As part of the analysis, the appraiser applied adjustments to the comparable properties for differences in lot size, room counts, building size, basement features, garage capacity, and other physical or amenity-related characteristics.

Based on the adjusted sales prices of the comparable properties, which ranged from approximately $1,957,000 to $2,054,500, the appraiser concluded that the subject's market value was $2,000,000 as of January 1, 2021.

The appellant requested that the assessed value of the subject property be reduced to reflect this estimated market value.

The Board of Review submitted its Notes on Appeal reporting that the subject property, identified under PIN 14-32-102-049-0000, was assessed at $237,198, with land assessed at $58,400 and improvements at $178,798. The Board of Review indicates that PIN 14-32-102-041-0000 is assessed solely for land, with no improvement assessment assigned, and a total assessment of $40,000.

The Board of Review relied on an equity analysis consisting of four comparable properties, all located within approximately one-quarter mile of the subject. These comparables were two- or three-story masonry dwellings of similar design, age, and construction quality, with building sizes ranging from 3,854 to 3,864 square feet. For two of the comparables, the Board of Review provided recent sales data showing sale prices of $2,325,000 and $2,100,000, with corresponding sale-price-per-square-foot values of $603.27 and $541.24.

The Board's submission emphasized that all comparables were in immediate proximity to the subject and asserted that the property's assessment was supported by the building-square-foot rates derived from these sales and assessments. In its filing, the Board of Review requested confirmation of the subject's assessment and stated that the submitted evidence supported the correctness of the valuation placed on the property.

This matter was scheduled for hearing, but prior to the hearing date the parties jointly submitted a written request to waive the hearing and have the appeal decided solely upon the evidence previously submitted. The administrative law judge granted the parties' request.

Conclusion of Law

The appellant contends that the assessed valuation of the subject property does not accurately reflect its market value. When market value is the basis of an appeal, the appellant must establish the value of the property by a preponderance of the evidence pursuant to Section 1910.63(e) of the Board's rules. Acceptable evidence of market value may include an appraisal, a recent sale of the subject property, comparable sales, or construction costs as set forth in Section 1910.65(c). After a thorough review of the record, the Board finds that the appellant has met this burden of proof and that a reduction in the subject's assessment is warranted.

The Board finds the most credible evidence of market value to be the appraisal submitted by the appellant. The appraisal was prepared by Gary J. Wydra, a Certified Residential Real Estate Appraiser, who personally inspected the subject property and developed an opinion of value as of January 1, 2021, using the sales comparison approach.

The appraiser analyzed three recent comparable sales; each located within the subject's Lincoln Park market area and ranging from approximately 0.14 to 0.58 miles from the subject. These comparables consisted of similarly designed two-story masonry dwellings of comparable age and size, with living areas between 3,647 and 3,933 square feet. The properties sold in 2020 for prices ranging from $1,875,000 to $2,000,000, including land. After applying adjustments for differences in lot size, room counts, building size, basement features, garage capacity, and other relevant characteristics, the appraiser concluded that the subject property had a market value of $2,000,000 as of the assessment date.

In contrast, the Board of Review submitted an equity-based grid of four comparable properties, supported largely by assessed valuation data. The Board of Review included sale information for only two of the comparables—showing market sale prices of $2,325,000 and $2,100,000—but did not submit full market-value adjustments or a complete appraisal analysis. The Board of Review further relied on assessment-derived per-square-foot calculations (approximately $45–48 per square foot of improvement assessment), which are based solely on *assessed values* rather than market transactions. Assessment-based price-per-square-foot figures are not a measure of market value and cannot substitute for verified arm's-length sales. Hypothetical extrapolations constructed from assessed-value PPSF data do not represent market activity and therefore do not constitute probative evidence of market value under the Board's rules.

Accordingly, the Board finds that the Board of Review did not present market-based valuation evidence. The appellant's appraisals supported by verified sales, a recognized valuation methodology, and adjustments consistent with accepted appraisal practice is substantially more persuasive than the Board of Review's equity data, which consists entirely of assessment information and hypothetical PPSF calculations lacking any foundation in actual market transactions.

The subject's current assessment produces a combined total assessed value of $277,198 for both parcels, consisting of $40,000 in land assessment for PIN 14-32-102-041-0000 and $58,400 (land) plus $178,798 (improvements) for PIN 14-32-102-049-0000.

This corresponds to an implied market value of approximately $2,771,980 under the 10% assessment level applicable to Class 2 property. Because the credible appraisal establishes a market value of $2,000,000, the Board finds that the current assessment exceeds the market value of the property.

Pursuant to Section 1910.50(c)(2) of the Board's rules, the 10% level of assessment for Class 2 property shall be applied to the market value determined herein. Based upon the evidence, the Board concludes that the appellant has demonstrated by a preponderance of the evidence that the subject property is overassessed, and a reduction in the assessment is therefore warranted.

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: September 15, 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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