FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Matthew Moog
DOCKET NO.: 21-56709.001-R-1
PARCEL NO.: 14-33-301-114-0000

The parties of record before the Property Tax Appeal Board are Matthew Moog, 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:

LAND:	$42,250
IMPR.:	$200,250
TOTAL:	$242,500

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 is a three-story single-family residence with a full finished lower-level living area, The home is approximately 25 years old and is of masonry construction, containing 4,851 square feet of above-grade living area. The residence includes four bedrooms, three full bathrooms, one half bathroom, and a two-car built-in garage. The subject is situated on a 3,380-square-foot site located in the City Chicago, Illinois within North Township. The subject is classified as class 2-08 property under the Cook County Real Property Assessment Classification Ordinance. The subject was reported as being owner occupied

The appellant contends that the subject property is overvalued and, in support of this position, submitted an appraisal estimating the subject's retrospective market value at $2,425,000 as of January 1, 2021. The appraisal was prepared by Mitchell J. Perlow, MAI, Certified General Real Estate Appraiser of Property Valuation Services, L.L.C., who indicated that the appraisal was intended solely for ad valorem tax assessment purposes. The appraiser conducted a physical inspection of the subject property on May 26, 2022, and developed his opinion of value using the sales comparison approach.

The appraisal identifies several comparable sales of similarly constructed three-story masonry residences located within the Lincoln Park and Old Town neighborhoods, each selling between 2020 and 2021, valuation date. These comparables ranged in unadjusted sale prices from $376.91 to $510.42 per square foot, establishing an appropriate value range for properties like the subject. The appraiser then made market-supported adjustments for differences in property age, condition, square footage, lot size, bathroom and bedroom count, and amenities such as elevators. Based on these adjustments, the appraiser concluded that the subject's appropriate value range fell between $495 and $505 per square foot, ultimately selecting $500 per square foot as the best indicator of market value. Applying this figure to the subject's 4,851 square feet of above-grade living area yielded a concluded retrospective market value of $2,425,000. Based on this evidence the appellant requested a total assessment for the lien year of $242,500.

The appellant submitted the Cook County Board of Review's decision letter indicating that the Board set the subject's total assessed valuation for the lien year under appeal at $333,359.

The Board of Review filed its Notes on Appeal along with photographs of the subject property and what it characterized as comparable properties; however, the Board of Review did not provide description narratives or sales data for either the subject or the purported comparables, limiting the evidentiary value of its submission.

In rebuttal, the appellant requested that the Property Tax Appeal Board establish a total assessed valuation of $242,500 for tax year 2021, asserting that the previously submitted appraisal—based on a personal inspection and a detailed sales comparison analysis—credibly established the correct market value.

This matter was scheduled for hearing; however, prior to the hearing date, the parties jointly submitted a written waiver requesting that the appeal be decided solely on the written evidence. The administrative law judge granted the request, and the appeal proceeded on the documentary record.

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 the burden of proving by a preponderance of evidence that the subject property is over assessed and that a reduction is warranted. The Board finds the appellant's appraisal credible and well supported through its application of the sales comparison approach to value. The appraiser personally inspected the subject property on May 26, 2022, which allowed for a direct evaluation of its physical characteristics, condition, and functional utility limitations, including original mechanical systems, the small lot size, the lack of an elevator, and the presence of below-grade living space—all factors the appraiser identified as relevant to a proper determination of market value. Using the sales comparison approach, the appraiser analyzed six recent comparable sales and made appropriate adjustments for differences in land area, location, building size, condition, functional utility, bedroom and bathroom counts, basement finish, and other pertinent characteristics. Based on this analysis, the appraiser concluded that the subject property had a market value of $2,425,000 as of January 1, 2021.

In contrast, the Board of Review submitted no descriptive information about the subject property and provided no sales data or market-based analysis to support the 2021 assessment it established. Accordingly, the Board finds that the Board of Review failed to present any competent evidence of market value. The appellant's appraisal supported by actual, verified sales and a recognized valuation methodology constitutes the only substantive evidence of market value contained in the record.

The subject's current assessment reflects an implied market value of $3,333,590, or approximately $687 per square foot of living area including land, a figure that exceeds the credible market value established in the appellant's appraisal. The Board therefore finds the subject property's market value to be $2,425,000 as of the assessment date at issue. Because market value has been established, the Board applies the 10 percent level of assessment for Class 2 property under the Cook County Real Property Assessment Classification Ordinance, as required by Section 1910.50(c)(2) of the Board's rules.

For these reasons, the Board concludes that the appellant has demonstrated that the subject property is over assessed, and a reduction in the assessment is 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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