



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

APPELLANT: Annette T. Howard & Gillis E. Howard
DOCKET NO.: 22-20291.001-R-1
PARCEL NO.: 12-12-411-023-0000

The parties of record before the Property Tax Appeal Board are Annette T. Howard & Gillis E. Howard, the appellants, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, 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: \$11,592
IMPR.: \$29,408
TOTAL: \$41,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 2022 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 two-story dwelling of frame and masonry exterior construction with 2,560 square feet of living area and which is approximately 70 years old with a reported effective age of 20+ years. Features include a full unfinished basement with an exterior access, central air conditioning, a fireplace, and a detached two-car garage. The property has an 8,917 square foot site and is located in Harwood Heights, Norwood Park Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted an appraisal prepared to estimate the market value of the subject for an equitable *ad valorem* property tax assessment by Agnieszka Jurowska, Certified Residential Real Estate Appraiser. The appraiser dated the report on February 8, 2023. Through use solely of the

sales comparison approach to value, the appraiser estimated the subject property had a market value of \$410,000, including land, as of January 1, 2022.

As to the subject dwelling, the home was described as being in “average” condition which featured “mostly dated (20 years old and more) finishes throughout.” On January 20, 2023, Jurowska performed an interior and exterior inspection of the subject.

For purposes of the sales comparison approach to value, Jurowska analyzed four sales of comparable properties located from .78 of a mile to 1.36-miles from the subject. As part of the report, the appraiser noted the subject’s site size, overall condition and basement finish could not be bracketed with any recent comparable sale data. The comparable parcels range in size from 3,690 to 4,688 square feet which are each improved with a “Traditional” residential dwelling of brick or brick and frame exterior construction. The condition of the comparable dwellings varies being average, good, very good and above average, respectively, with downward adjustments for each which differed from the subject. The homes range in age from 15 to 64 years old and range in size from 2,051 to 2,681 square feet of living area. Each comparable has a full basement, with varying degrees of finish. Each comparable has central air conditioning, and a two-car garage. The sales occurred from October 2020 to September 2021 for prices ranging from \$375,000 to \$489,000 or from \$175.48 to \$201.12 per square foot of living area, including land.

Next, the appraiser applied an adjustment to sale #1 for seller’s concession and upward time adjustments to both of the sales that occurred in calendar year 2020. The appraiser also applied adjustments to the sales for differences in location (busy road), lot size, exterior construction, bathroom count, dwelling size, and/or basement finish when compared to the subject property. Through this process, the appraiser set forth adjusted sales prices for the comparables ranging from \$396,700 to \$430,500, including land.

In reconciliation, Jurowska gave consideration to sales #2 and #3 as the most recent sales and sale #1 was given weight for the smallest gross adjustment. The appraiser stated the final value conclusion falls near the lower end of the adjusted values “due to overall condition of the subject property and lack of any recent updates.” The subject was determined to have a market value of \$410,000, including land, as of January 1, 2022. Based on this evidence, the appellants requested an assessment reflective of the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$50,999. The subject's assessment reflects a market value of \$509,990 or \$199.21 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located in the same neighborhood code as the subject and two of which were in the sub area and same block as the subject. The parcels range in size from 5,360 to 8,917 square feet of land area which are improved with class 2-06 two-story dwellings of stucco, masonry, or frame and masonry exterior construction. The homes range in age from 64 to 70 years old and range in size from 2,322 to 3,590 square feet of living area. Three comparables have full basements, two of which have finished area, and comparable #2 has a concrete slab

foundation. Each home has central air conditioning, and either a 2-car or a 2.5-car garage. Comparable #1 has a fireplace. The comparables sold from February 2019 to August 2020 for prices ranging from \$549,000 to \$705,000 or from \$196.38 to \$239.02 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend 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 appellants met this burden of proof and a reduction in the subject's assessment is warranted.

The appellants submitted an appraisal valuing the subject as of the lien date and the board of review supplied four suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given little weight to board of review comparable #2 due to its differing concrete slab foundation. In addition, both board of review comparables #2 and #3 are given less weight as the sales occurred in 2019, dates more remote to the valuation date at issue herein of January 1, 2022. Board of review comparables #1 and #4 are each superior to the subject in age and finished basement area.

The Board finds the best evidence of market value to be the appraisal submitted by the appellants as the appraiser described the condition of the subject property and applied adjustments to the comparables in light of those conditions. Furthermore, the sales chosen by the appraiser are most proximate in time to the valuation date at issue and the adjustments made to the comparables appear to be consistent for similar differences when compared to the subject. The subject's assessment reflects a market value of \$509,990 or \$199.21 per square foot of living area, including land, which is above the appraised value conclusion of \$410,000 or \$160.16 per square foot of living area, including land.

After thoroughly analyzing the evidence of record, the Board finds the subject property had a market value of \$410,000 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: September 16, 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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