



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

APPELLANT: Tom Leko
DOCKET NO.: 22-22553.001-R-1
PARCEL NO.: 11-31-412-047-0000

The parties of record before the Property Tax Appeal Board are Tom Leko, the appellant, by attorney Daniel G. Pikarski, of Gordon & Pikarski 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: \$6,744
IMPR.: \$43,256
TOTAL: \$50,000

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 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 an approximately 97-year-old, three-story, three-unit, multi-family dwelling of masonry construction with 4,653 square feet of living area¹. Features of the dwelling include a full unfinished basement, a two-car garage and a parking pad. The property has a 3,747 square foot site and is located in Chicago, Rogers Park Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal that utilized both the sales comparison and income approaches

¹ This Board relies on the description of the subject property as submitted by the appellant based on the appraiser's physical inspection of the property and photographs as well as the board of review's failure to argue or submit evidence to the contrary.

to valuation and estimated that the subject property had a market value of \$500,000 as of January 1, 2021.

For the income approach, the appraiser relied upon the rent roll as well as actual rents in the area with consideration for age, condition, construction, appeal, location, and amenities of the apartments. The appraiser utilized four rental comparables with a mix of three-bedroom and two-bedroom units. The rental income for the apartment comparables ranged from \$1,050 to \$1,750 per month. After making adjustments for differences, the appraiser noted the indicated market rent is \$1,500 each of the three units.

To develop the gross income approach, the appraiser analyzed the property as if it were fully occupied. Rental income from all units totaled \$55,800, in estimated projected gross income. The appraiser subtracted 10% of this amount, or \$5,580, for vacancy and collection loss, leaving an effective gross income of \$50,220. The appraiser didn't provide for the subject's annual expenses; therefore, leaving a potential net operating income of \$50,220.

Using the direct capitalization technique, the appraiser determined an adjusted capitalization rate of 10.13%. The appraiser then calculated the subject's value under the income approach by dividing the net operating income of \$50,220 by the capitalization rate of 10.13% for a total of \$495,755, rounded to \$500,000.

For the sales approach, the appraiser relied on four suggested sales comparables for amounts ranging from \$410,000 to \$565,000 or between \$115.97 and \$141.39 per square foot of living area, land included in the sale prices. The appraiser adjusted the sales prices to account for differences between the comparables and the subject. After applying the adjustments, the appraiser determined that the subject's market value was \$500,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$59,509. The subject's assessment reflects a market value of \$595,090, or \$127.89 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

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 taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 that the best evidence of the subject's market value is the appraisal submitted by the appellant. That appraisal employed the sales comparison and income approaches. The sales comparison approach relied upon recent sales of four suggested comparable properties. The

appraisal stated that the sale prices of the suggested comparable properties were adjusted to account for differences between them and the subject, taking into account such factors as size, condition and location, and the appraiser determined that the subject's market value under that approach was \$500,000 as of January 1, 2021. The appraisal's income approach relied on the subject's rent roll and market rental data from apartments of comparable size units. The appraiser determined that the subject's value under this approach was \$500,000 as of January 1, 2021. Reconciling the two approaches, the appraiser determined that the subject had a market value of \$500,000 as of January 1, 2021.

In contrast, the board of review's evidence consists of unadjusted raw data. Based on the evidence, the Board therefore finds the appellant has proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment is justified.

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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Tom Leko, by attorney:
Daniel G. Pikarski
Gordon & Pikarski
55 West Monroe Street
Suite 940
Chicago, IL 60603

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602