



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

APPELLANT: Stephen Hans Montgomery
DOCKET NO.: 22-36351.001-R-1
PARCEL NO.: 14-20-324-028-0000

The parties of record before the Property Tax Appeal Board are Stephen Hans Montgomery, the appellant(s), 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: \$45,000
IMPR.: \$4,932
TOTAL: \$49,932

Subject only to the State multiplier as applicable.

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 a three story, mixed-use building of masonry construction containing 5,501 square foot of living area that was demolished in July 2020. The property has a 6,250 square foot site and is located in Lake View Township, Cook County.

The appellant contends that the subject's market value is not accurately reflected in the assessed value as the basis of the appeal. The subject was purchased on January 9, 2022 for \$690,000 and demolition completed on March 16, 2022 following issuance of the demolition permit dated February 23, 2022. The appellant argues that the subject's improvement was demolished and removed since March 2022. In support, the appellant submitted a demolition declaration signed by the appellant, City of Chicago building permit for demolition dated February 23, 2022, City of Chicago vacant building registration printout, and color photographs of the subject. Based on the evidence, the appellant requested the subject's assessment be reduced to \$45,000 to reflect the demolition of the subject in 2022.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's total assessment of \$69,000 was disclosed. This assessment reflects a market value of \$690,000 when using the 10% level of assessment for class 2 properties as determined by the Cook County Real Property Classification Ordinance. In support of the subject's assessment, the board of review submitted four equity comparables and property index card. In addition, the board of review confirms that the subject was purchased in 2022 for \$690,000. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

When overvaluation is claimed, the appellant has the burden of proving the value of the property by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3d Dist. 2002); Winnbago County Board of Review v. Property Tax Appeal Board, 313 Ill.App.3d (2d Dist. 2000). Proof of market value may consist of an appraisal, a recent arm's length sale of the subject property, recent sales of comparable properties, or recent construction costs of the subject property. 86 Ill. Admin. Code 1910.65(c). Having considered the evidence presented, the Board concludes that the evidence indicates a reduction in the subject's assessment is warranted.

The Board finds that the best evidence of the subject's market value is the sale of the subject in January 2022 for \$690,000. Since market value has been determined, the 10% level of assessment for class 2 properties as determined by the Cook County Real Property Classification Ordinance shall apply. In applying this level of assessment to the subject, the total assessed value is \$69,000.

When the demolition of a property is at issue, Section 9-180 of the Property Tax Code is applicable, which states, in relevant part:

When, during the previous calendar year, any buildings, structures or other improvements on the property were destroyed and rendered uninhabitable or otherwise unfit for occupancy or for customary use by accidental means (excluding destruction resulting from the willful misconduct of the owner of such property), the owner of the property on January 1 shall be entitled, on a proportionate basis, to a diminution of assessed valuation for such period during which the improvements were uninhabitable or unfit for occupancy or for customary use to December 31 of the year.

Computations under this Section shall be on the basis of a year of 365 days.

35 ILCS 200/9-180. The Board finds that the improvement upon the subject was demolished as of March 16, 2022. This fact was evidenced by the appellant's photographs, brief, demolition declaration and the demolition permit. Thus, the improvement was standing for 75 days, or 20.55 % of the year. Therefore, under Section 9-180 of the Property Tax Code, the subject's total improvement assessment based on the subject's market value of \$690,000 shall be diminished by 79.45% and a reduction 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: _____

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:

March 17, 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

AGENCY

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