FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Melanie Glass
DOCKET NO.: 22-37301.001-R-1
PARCEL NO.: 17-06-416-038-0000

The parties of record before the Property Tax Appeal Board are Melanie Glass, the appellant(s), by attorney Caren Gertner, of the Law Office of Gertner & Gertner, Ltd. 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:	$22,050
IMPR.:	$33,450
TOTAL:	$55,500

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 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 is improved with a 143-year-old, masonry constructed, multi-family, two-and-a-half-story residential building containing 1,638 square feet of above-grade living area, along with a finished below-grade garden apartment unit. The improvements consist of three dwelling units: two five-room, one-bedroom, one-bathroom apartments on the first and second floors, and one three-room, one-bedroom, one-bathroom garden unit. The property also includes an unfinished attic, an enclosed rear porch and stair system, and a two-car detached garage. The subject is situated on a 3,150 square foot interior site located in the city of Chicago within West Chicago Township. The subject is classified as Class 2-11 property under the Cook County Real

Property Assessment Classification Ordinance. The appellant reports that property is non-owner-occupied[1].

The appellant submitted a retrospective summary appraisal indicating that the subject property is overvalued. The appraisal was prepared by Martin G. Perlow, Associate Real Estate Trainee Appraiser, and Mitchell J. Perlow, MAI, of Property Valuation Services, who personally inspected the subject property on April 22, 2022. The purpose of the appraisal was to provide an opinion of the market value of the subject real estate as of the retrospective date of January 1, 2021, specifically to establish an equitable ad valorem tax assessment, and for no other purpose.

The appraisers developed an opinion of market value relying solely on the Sales Comparison Approach. In their analysis, they considered five comparable sales of masonry-constructed two-unit residential buildings, each containing an additional garden apartment, all located within the surrounding Chicago area. These sales occurred between November 2019 and February 2021 and reflected unadjusted sale prices ranging from $271.94 to $351.87 per square foot.

The appraisers made adjustments to each comparable for differences in conditions of sale, market conditions, location, basement finish, garage presence, HVAC systems, attic finish, land-to-ground-floor-area ratio, average unit size, and age/condition. After applying these adjustments, the appraisers concluded that the subject property's appropriate unit value was approximately $340.00 per square foot. Applying this conclusion to the subject's 1,638 square feet of above-grade living area, the appraisal determined a retrospective market value of $555,000 as of January 1, 2021.

Based on the value conclusion from the appraisal, the appellant requested a reduction in the 2022 assessed valuation, seeking a total assessment of $55,500, corresponding to an indicated market value of $550,000.

The Board of Review submitted its Notes on Appeal reporting a 2022 assessed value of $70,158**,** consisting of $22,050 for land and $48,108 for the improvement. The Board did not provide an independent opinion of market value, instead relying on its existing assessment and supporting market data.

To support the assessment, the Board of Review presented four comparable sales**,** all classified as Class 2-11 residential properties located within Neighborhood Code 51**,** the same neighborhood code assigned to the subject. The comparable properties are located within approximately 1/4 mile of the subject and were sold between April 2020 and October 2021. Reported unadjusted sale prices ranged from $560,000 to $1,150,000, with building sizes ranging

[1] The Board finds that the description of the subject property is supported by the evidence submitted by both parties. Where discrepancies exist between the parties' descriptions, the Board accords greater weight to the appraiser's description, as the appraiser conducted a physical inspection of the property in connection with the preparation of the appraisal.

from 861 to 2,480 square feet, resulting in sale prices per square foot between $225.81 and $1,335.66.

Based on this evidence, the Board of Review requested that the 2022 assessment of the subject property be confirmed.

Conclusion of Law

The appellant contends that the assessed valuation of the subject property does not accurately reflect its market value. Under Section 1910.63(e) of the Board's rules, an appellant challenging an assessment on the basis of market value must prove that value by a preponderance of the evidence. Acceptable evidence includes an appraisal, recent sale of the subject property, comparable sales, or construction cost data as set forth in Section 1910.65(c). After reviewing the entire record, the Property Tax Appeal Board finds that the appellant has met this burden.

The Property Tax Appeal Board finds that the appellant submitted competent evidence sufficient to rebut the presumption of correctness of the Board of Review's assessment. The appellant's retrospective appraisal was prepared in conformity with recognized appraisal standards, with the stated purpose of establishing an equitable ad valorem tax assessment as of January 1, 2021. The appraisers relied exclusively on the Sales Comparison Approach, analyzing five comparable sales occurring between November 2019 and February 2021.

The appraisal shows that the comparables required market-supported adjustments for differences in conditions of sale, market conditions, location, basement finish, garage presence, HVAC systems, attic finish, land-to-ground-floor-area ratio, average unit size, and age/condition. After applying these adjustments, the appraisers concluded an indicated unit value of approximately $340 per square foot, resulting in a retrospective market value of $555,000 for the subject property as of the valuation date.

The Board further finds that the Board of Review submitted assessment data and four comparable sales, but did not present an appraisal, an adjusted sales analysis, or any narrative explaining how its raw sales data supported the subject's 2022 assessed value of $70,158. The Board of Review did not provide any adjustments addressing differences in building size, construction, garage presence, attic finish, land-to-floor-area ratio, or other characteristics, despite these differences appearing in its submitted grid.

The record reflects that the subject's assessed valuation of $70,158 corresponds to the Board of Review's stated assessment and its underlying opinion of value based solely on the assessment, without any accompanying market-based reconciliation to the comparable sales it submitted. As the Board of Review did not present analysis connecting its comparable sale prices to the assessment, the Board finds the BOR's evidence insufficient and entitled to minimal weight.

Given the absence of market-supported valuation analysis from the Board of Review and the presence of adjusted, market-based evidence in the appellant's appraisal, the Property Tax

Appeal Board concludes that the appellant has met the required burden of proof in an overvaluation appeal—namely, proving by a preponderance of the evidence that the assessment does not accurately reflect the property's fair cash value. Accordingly, the Board finds the subject property to be over assessed, and a reduction in the assessed valuation 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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