



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

APPELLANT: Gwen Stark Ladley
DOCKET NO.: 22-39134.001-R-1
PARCEL NO.: 14-31-108-014-0000

The parties of record before the Property Tax Appeal Board are Gwen Stark Ladley, the appellant, 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: \$18,312
IMPR.: \$36,688
TOTAL: \$55,000

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 property¹ consists of a three-story multi-family building of frame and masonry exterior construction with 1,740 square feet of gross building area which is approximately 130 years old. Features include a concrete slab foundation, 2 full bathrooms, and a 1.5-car garage. The property has a 2,616 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The Property Tax Appeal Board takes judicial notice that this property has been the subject matter of three consecutive years' appeals. In both 2021 and 2023, the property was marked as not owner-occupied. Only in this 2022 tax year appeal, the property is noted as owner-occupied. However, the Board further observes the appellant's mailing address is the same as that of counsel, which raises more questions regarding occupancy of the property, besides the other two years' appeals information. The Board is treating this property as not owner-occupied on this questionable record.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant completed Section IV – Recent Sale Data reporting the subject property was purchased on June 11, 2021, for a price of \$550,000. The appellant further reported the parties to the transaction were not related and the property was sold by the owner. Additionally, the property was not sold due to a foreclosure action, nor was it sold using a contract for deed. The appellant acknowledged the property was not advertised for sale. The appellant submitted a copy of the real estate sales contract reiterating the sale price and a copy of the Settlement Statement. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$60,000. The subject's assessment reflects a market value of \$600,000, land included, when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales, none of which are located in the subject's neighborhood code. The parcels range in size from 2,575 to 3,108 square feet of land area and are improved with class 2-05 or 2-11 two-story multi-family buildings of frame exterior construction. The buildings range in age from 111 to 137 years old and range in size from 810 to 2,175 square feet of gross building area. Three comparables have full basements, one of which is finished as an apartment, and one has a concrete slab foundation. Features include from 1 to 3 full bathrooms, and three comparables each have a 1.5-car garage. The comparables sold from September 2020 to May 2022 for prices ranging from \$630,000 to \$832,500, including land. The data for the subject also depicts a sale in July 2021 for \$550,000.

Based on the foregoing evidence and argument, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant contends the market value of the subject property has been established and a reduction should issue.

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

The appellant reported the June 2021 sale of the subject, which was confirmed in the board of review's evidence, and included suggested comparable properties to support the parties' respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the board of review comparables due to differences in classification, story height, foundation type, bathroom count and/or significant differences in building size when compared to the

subject. In addition, board of review comparable #1 sold least proximate in time to the lien date with a sale occurring in September 2020 for this appeal as of January 1, 2022.

The Board finds the best evidence of market value to be the purchase of the subject property in June 2021 for a price of \$550,000. The appellant provided evidence demonstrating the sale was not between related parties and was not due to foreclosure nor was the property sold via a contract for deed. In addition, copies of the sales contract and the Settlement Statement were provided by the appellant reiterating the price and date. While the Board finds it is troubling that there is an affirmative statement that the property was not advertised on the open market prior to sale, on this limited record, the sale price is the best and only supported evidence of market value in the record.

The Board finds the purchase price of \$550,000 is below the market value reflected by the assessment of \$600,000. Additionally, and most notably, the Property Tax Appeal Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value. The Board finds the submission of two-story buildings in response to this appeal, where the properties are up to 54% different in building size when compared to the subject, fails to overcome the appellant's sale evidence. This conclusion is further bolstered by the board of review's acknowledgement of the sale of the subject in its grid analysis.

Based on this record, the Board finds the subject property had a market value of \$550,000 as of January 1, 2021. Since market value has been determined 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: _____

May 20, 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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