FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Janelle Reynolds
DOCKET NO.: 22-43019.001-R-1
PARCEL NO.: 13-35-234-006-0000

The parties of record before the Property Tax Appeal Board are Janelle Reynolds, the appellant(s), by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds ***No Change*** 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:	$13,348
IMPR.:	$46,202
TOTAL:	$59,550

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 a three-story multi-unit dwelling of masonry construction with 3,714 square feet of living area. The dwelling was 113 years old. Features of the home include a crawl space foundation, central air conditioning, and a 2.5-car garage. The property has a 4,448 square foot site and is located in Chicago, Jefferson Township, Cook County. The property is a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance. Appellant disclosed that this is not an owner-occupied residence.

The appellant contends overvaluation and assessment inequity as the basis of the appeal. In support of the argument of overvaluation the appellant submitted an appraisal estimating the subject property had a market value of $615,000 as of January 1, 2021. The appraisal was prepared by a certified appraiser who inspected the subject property on December 12, 2022, and asserted that the highest and best use of the subject property as improved was its present use. The appraiser used the sales comparison and rental income approaches to valuation of the subject property.

Under the sales comparison approach, the appraiser utilized three comparable sales properties which were located within a 0.47-mile radius of the subject property. The comparable properties sites ranged in size from 3,150 to 4,170 square feet of land area and from 2,889 to 3,300 square feet of living area. The properties are each improved with a multi-unit dwelling of frame or masonry construction that were from 108 to 111 years old. The comparable properties sold from July to August 2021 for prices ranging from $589,000 to $658,000 or from $198.32 to $214.61 per square foot of living area, land included in the sales prices. The appraiser adjusted for living area and number of units. The appraiser concluded that based on the sales data and applying adjustments to the comparable sales for differences from the subject, the subject had a market value of $615,000.

Under the rental income approach the appraiser analyzed three comparable rental properties, the same as listed above in the sales comparison approach section, located within a 0.47-mile radius of the subject property. Considering the data from the rental properties, the appraiser estimated total market rent for the subject of $4,350 per month. The appraiser multiplied the total monthly rent by a multiplier of 145 and arrived at a value under the rental income approach of $630,750.

In support of the argument of assessment inequity the appellant submitted information on four class 2-11 equity comparable properties with varying degrees of similarities to the subject which are located within a 0.92-mile radius of the subject. The improvements ranged: in age from 110 to 129 years; in size from 3,648 to 3,774 square feet of living area; and in improvement assessment from $8.25 to $9.41 per square foot of living area. Based on this evidence the appellant is seeking a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $59,550. The subject's assessment reflects a market value of $595,500 or $160.34 per square foot of living area, including land, when applying the level of assessments for class two 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 class 2-11 equity comparable properties with varying degrees of similarities to the subject which are located within the same subarea as the subject including three within the same block as the subject. The improvements were 108 or 113 years old, had from 3,438 to 3,831 square feet of living area, and had improvement assessments from $12.63 to $18.50 per square foot of living area.

The board of review in its notes on appeal asserted that the price per square foot and estimated market value of the subject property was attained with calculations involving information found in its equity assessment grid. The board of review did not offer an appraisal or comparable sales properties .

The appellant submitted written rebuttal requesting that the board of review be defaulted in this case as the board of review only submitted equity comparable assessment evidence and did not respond with any evidence as to market value of the subject.

Conclusion of Law

The appellant asserts that the board of review should be defaulted in this case as the board of review did not offer comparable sales evidence in response to the appellant's overvaluation argument and therefore did not respond with evidence sufficient to comply with PTAB rules. The Board finds that the limited market value evidence offered by the board of review will be considered and given its appropriate weight.

The appellant contends, in part, that 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

As to the argument of overvaluation, the board of review presented calculations based on equity comparable properties to arrive at a purported market value of the subject property. The Board gives no weight to the limited market value contention of the board of review. The appellant offered an appraisal which estimated that the market value of the subject property as of January 1, 2021, was $615,000, which reflects an assessment of $165.59 per square foot of living area, land included, applying the level of assessment for class two property under the Cook County Real Property Assessment Classification Ordinance of 10%. The subject property has an assessment of $59,550 denoting a market value of $595,500. These figures reflect an assessment of $160.34 per square foot of living area, land included, which is below the assessment estimated in the appraisal. The appellant has the burden by a preponderance of the evidence to show that the subject property is overvalued in the assessment process. In this case, the appellant failed to meet this burden by offering an appraisal which estimated a market value above that which is reflected in the assessment. While it is not the duty of the board of review to prove that the assessment is correct, it is the burden of the appellant to show by a preponderance of the evidence overvaluation in the assessment process. The appellant failed to meet this burden and a reduction in the assessment on this basis is not warranted.

The taxpayer contends, in part, assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted eight equity comparable properties for the Board's consideration in determining assessment equity. The Board finds the best evidence of assessment equity to be appellant's comparables #1 through #4 and board of review's comparables #1, #2, and #3. These comparables were similar to the subject in design, construction, proximity, age, size, and number of bathrooms. These comparable properties were similar to the subject and had improvement assessments that ranged from $8.25 to $18.50 per square foot of living area. The subject's improvement assessment of $12.44 per square foot of living area falls within the range established by the best comparable properties in this record. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment on this basis is not 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:

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

AGENCY

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