FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jay Hausler
DOCKET NO.: 22-43115.001-R-1
PARCEL NO.: 14-18-311-040-0000

The parties of record before the Property Tax Appeal Board are Jay Hausler, the appellant(s), 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:	$33,480
IMPR.:	$19,020
TOTAL:	$52,500

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 three-story, masonry-constructed multi-unit residential building built in 1955, containing a gross building area of approximately 4,284 square feet. The improvements consist of 15 rooms, including 6 bedrooms and 4 bathrooms. The property has no garage. The subject is situated on a 3,720-square-foot interior lot in the City of Chicago, Lake View Township, and is classified as Class 2-11 under the Cook County Real Property Assessment Classification Ordinance. The appellant reports that the property is not owner-occupied.

The appellants contend that the subject property is overvalued. In support of this position, they submitted a summary appraisal report concluding a market value of $525,000 as of January 1, 2021. The appraisal was prepared by Gary J. Wydra, Certified Residential Real Estate Appraiser,

of City Wide Appraisal Services, Inc., who personally inspected the subject property on September 7, 2021. The purpose of the appraisal was to provide an opinion of the market value of the subject real estate as of January 1, 2021, specifically to establish an equitable ad valorem tax assessment and for no other purpose.

The appraisal employs both the sales comparison approach and the income approach to estimate market value. For the sales comparison approach, the appraiser examined three comparable multi-unit residential sales located within the subject's broader marketing area. All selected comparables were improved with multi-unit residential buildings similar in overall use and configuration to the subject, and the comparable properties sold between 2019 and 2021. The appraiser evaluated each sale for differences in location, gross building area, age, condition, parking, design, and other relevant physical and economic characteristics. After analyzing the adjusted indicators, the appraiser concluded that a value of $525,000 was appropriate under the sales comparison approach. In developing the income approach, the appraiser analyzed market rents and derived a gross rent multiplier to arrive at an income-based value indication. The appraisal also reports that the cost approach was not used because it is not a typical consideration for purchasers of older multi-unit properties and is considered inapplicable for the assignment. In reconciling the two approaches, the appraiser placed primary emphasis on the sales comparison approach due to its stronger market support, while giving supportive consideration to the income approach, resulting in a final value conclusion that gave the greatest weight to the sales analysis. The appraiser's stated assignment specifies that the value is as of January 1, 2021, while the inspection occurred on September 7, 2021, making the appraisal retrospective. Based on the opinion of value contained in the appraisal, the appellant requests that the total assessed valuation for the subject be set at $52,500 for the 2022 assessment year.

The Board of Review submitted its Board of Review Notes on Appeal, disclosing a total assessment for the subject property of $59,444, which reflects an implied market value of approximately $594,440 based on the 10 percent assessment level for Class 2-11 property. Based on the reported building area of 4,285 square feet, the subject's implied market value corresponds to an overall market value of approximately $138.75 per square foot, land included.

The Board of Review submitted its Board of Review Notes on Appeal, disclosing a total assessment for the subject property of $59,444, which reflects an implied market value of approximately $594,440 based on the 10 percent assessment level for Class 2-11 property. Based on the reported building area of 4,285 square feet, the subject's implied market value corresponds to an overall market value of approximately $138.75 per square foot, land included. In support of its position that the subject is not over-assessed, the Board of Review submitted assessment data for four comparable multi-unit residential buildings. The submitted grid reflects that the comparables are located approximately one-quarter mile from the subject. The Board of Review did not submit any sales information for these properties, and the data consisted solely of unadjusted assessment figures without analysis or adjustments for differences in location, configuration, age, condition, or other relevant property characteristics.

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

In rebuttal, the appellant asserts that the appraisal submitted in support of the appeal provides a credible and persuasive indication of the subject's market value because it was written by a licensed professional appraiser who personally inspected the subject property, reviewed the property's history, and used similar properties in the sales comparison approach, providing sufficient detail for each while making necessary adjustments for location, size, age, land-to-building ratio, construction materials, and other relevant factors. The appellant further contends that the Board of Review submitted nothing other than raw, unadjusted assessment and sales data, which has historically been unpersuasive in this venue. The rebuttal also states that the appraisal report had already been submitted and supports the market value conclusion previously offered. Based on the previously submitted documentation, the rebuttal requests that the subject's 2022 total assessed valuation be established at $52,500.

Conclusion of Law

The appellant contends that the assessed valuation of the subject property does not accurately reflect its fair market value. When market value is the basis of an appeal, the value must be established by a preponderance of the evidence. Acceptable evidence of market value includes appraisals, a recent sale of the subject property, comparable sales, or construction costs. After reviewing the record, the Board finds that the appellant has met this burden, and a reduction in the assessment is warranted.

The appellant submitted a retrospective appraisal prepared by a Certified Residential Real Estate Appraiser concluding a market value of $525,000 as of January 1, 2021. The appraisal was prepared for ad valorem tax purposes, was based on a personal inspection of the subject property and developed both the sales comparison approach and the income approach, with the appraiser determining that the sales comparison approach provided the most reliable indicator of value and reconciling to a final value conclusion of $525,000. The Board finds the appellant's appraisal to be the most persuasive and credible evidence of market value in the record. The appraisal is retrospective to the lien year at issue, based on an inspection of the subject property, and supported by analyses of proximate comparable sales that were similar in design, location, and overall utility. The appraisal also considered market rents and operating characteristics of comparable multi-unit properties in developing the income approach, further supporting the concluded value.

In contrast, the Board of Review submitted assessment information for four multi-unit residential buildings. The data consisted solely of unadjusted assessments without any accompanying sales information. Unadjusted assessment data, presented without market analysis or valuation methodology, is insufficient to establish market value or to rebut a professionally prepared appraisal based on an inspection and accepted appraisal techniques.

Accordingly, the Board finds that the subject property had a market value of $525,000 as of January 1, 2022. Based on the evidence presented, 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:

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: November 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 9-215 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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