



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

APPELLANT: Michael Hendrie  
DOCKET NO.: 22-43611.001-R-1  
PARCEL NO.: 14-19-321-015-0000

The parties of record before the Property Tax Appeal Board are Michael Hendrie, the appellant, by attorney Glenn Guttman of Rieff Schramm Kanter & Guttman 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:** \$38,750  
**IMPR.:** \$21,250  
**TOTAL:** \$60,000

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 property consists of a two-story multi-family building of frame exterior construction with 2,555 square feet of gross building area. The building is approximately 118 years old. Features of the home include a full unfinished basement, two bathrooms and a two-car garage. The property has an approximately 3,100 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on August 12, 2022, for a price of \$600,000. The appellant completed Section IV—Recent Sale Data of the appeal petition indicating the subject property was purchased from Donald J. and Classey Nehrke, the parties to the transaction were not related, the property was sold through a realtor and had been

advertised for sale in the Multiple Listing Services (MLS) for 30 days. To document the sale the appellant submitted a copy of the settlement statement which reiterated the sale date and purchase price but did not depict the distribution of commissions.

In a brief, counsel for the appellant argued that the subject in order that the 2022 assessed valuation reflect the recent purchase for \$600,000 and the demolition of improvements, a 10% occupancy factor be applied to the depreciated cost of the improvements resulting in a reduced total assessment of \$40,875. The appellant also submitted a building permit issued by the City of Chicago on September 20, 2022 to “wreck and remove a 2 story frame multi unit residence and a detached frame garage.” Or alternatively the assessment should be reduced to reflect the subject’s purchase price of \$600,000 for a total assessment of \$60,000.

Based on this evidence, the appellant requested in section 2c(2) of the appeal petition that the subject’s total assessment be reduced to \$60,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$71,000. The subject's assessment reflects a market value of \$710,000 or \$277.89 per square foot of gross building area, including land, when applying the level of assessment for class 2 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 comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located approximately ¼ of a mile from the subject property or within the subject’s subarea. The comparables have sites ranging in size from 3,082 to 3,125 square feet of land area. The comparables are improved with two-story multi-family buildings of frame exterior construction ranging in size from 2,666 to 3,118 square feet of gross building area. The buildings are from 123 to 143 years old. Three comparables each have a full basement, two of which are finished with an apartment and one comparable has a crawl space foundation. Each comparables has three or four bathrooms, three comparables have central air conditioning and three comparables each have a two-car garage. The properties sold from July 2021 to January 2022 for prices ranging from \$835,000 to \$985,000 or from \$269.40 to \$362.53 per square foot of gross building area, including land. The board of review also reported the subject was purchased on August 16, 2022 for \$600,000 or \$234.83 per square foot of gross building area, including land.<sup>1</sup> Based on this evidence, the board of review requested confirmation of the subject’s assessment.

In written rebuttal, counsel for the appellant contends the subject was purchased for \$600,000. The subject was vacant when purchased and subsequently demolished during the 2022 tax year and the improvement assessment should reflect that point. Thus, counsel contends that valuing the subject at its purchase price, less the land portion of the assessment and removing ¼ of the improvement assessment for demolition of the improvements for October through December results in an overall market value of \$546,880 or \$54,688. The appellant’s counsel critiqued the

---

<sup>1</sup> The parties differ as to the subject’s date of the sale. The Board finds the MLS listing and settlement statement provided by the appellant depicting a sale date of April 15, 2021, is the best evidence in the record.

four comparables submitted by the board of review. Counsel requested the subject's total assessment be reduced to reflect a valuation of \$54,000 to \$60,000.

### **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 submitted evidence of the 2022 sale of the subject property and the board of review submitted four comparables sales to support their respective positions before the Board.

The appellant also made a vacancy argument in the form of a brief written by counsel indicating the demolition of the improvements should be taken into consideration. A copy of a building permit issued by the City of Chicago was submitted as supporting documentation. The Board finds the building permit was issued in September 2022 for the demolition of the subject's multi-family building and detached garage, however the appellant failed to provide any documentation that depicts the date that the demolition occurred, such as an invoice or an affidavit from the contractor stating the date the demolition was completed. Without this evidence, the Board finds it impossible to know if a reduction in the subject's improvement assessment is warranted based on the purported demolition the improvements.

The Board finds the best evidence of market value to be the purchase of the subject property in August 2022 for a price of \$600,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant disclosed the parties to the transaction were not related and the property was not sold due to a foreclosure action or using a contract for deed. In further support of the transaction, the appellant submitted a copy of the settlement statement reiterating the sale date and the purchase price. The Board finds the board of review did not present any substantive evidence to challenge the arm's length nature of the subject's sale transaction. In addition, the assessing officials did not refute the contention that the purchase price was reflective of market value. The Board finds the purchase price of \$600,000 is below the market value of \$710,000 as reflected by the assessment. Furthermore, the Board gave less weight to board of review comparables #1, #2 and #3 which have central air conditioning, unlike the subject and/or they differ from the subject in that they have either a crawl space foundation or a basement apartment. The Board finds the board of review's remaining comparable sale does not overcome the weight given to the subject's arm's length sale transaction. As a final point, the board of review reported the same sale of the subject in 2022 for \$600,000, which is the basis of the appellant's appeal on market value grounds. Therefore, based on this record the Board finds subject property had a market value of \$600,000 as of the assessment date at issue. Since market value has been established, the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00% shall apply.

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: \_\_\_\_\_

September 16, 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Michael Hendrie, by attorney:  
Glenn Guttman  
Rieff Schramm Kanter & Guttman  
100 North LaSalle Street  
Suite 1410  
Chicago, IL 60602

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602