FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Katie Mack
DOCKET NO.: 22-46281.001-R-1
PARCEL NO.: 14-18-222-005-0000

The parties of record before the Property Tax Appeal Board are Katie Mack, the appellant, by attorney Brian Mack, of Mack Tragos & Hoffman, 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 ***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:	$66,000
IMPR.:	$150,000
TOTAL:	$216,000

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 dwelling of frame exterior construction with approximately 7,594 square feet of living area.[1] The dwelling is approximately 7 years old. Features of the home include a basement, central air conditioning, 5½ bathrooms, a fireplace and a three-car garage.[2] The property has an 8,250 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

[1] The appellant reported a dwelling size of 7,594 square feet which was supported by building permit information. The board of review reported a dwelling size of 4,977 square feet without any support. The Board has accepted the construction permit data as reflecting the correct dwelling size.
[2] The appellant reported a three-car garage, which is supported by building permit information. The board of review described a one-car garage. In the absence of data resolving the conflict, the Board has accepted the construction data indicating the home has a three-car garage.

The appellant's appeal is based on overvaluation. In support of this argument the appellant completed Section VI – Recent Construction Information concerning the subject property. The appellant reported the land was purchased in March 2010 for $800,000. The appellant reported the subject building was erected on March 23, 2019 for a cost of $810,750 or a total investment in the land and improvement(s) of $1,610,750. The appellant further reported that the building cost included all costs incurred, including contractor's fees, architectural or engineering fees and landscaping of the homesite along with building permits. The appellant also reported the property was suitable for occupancy on June 1, 2020 when an occupancy permit was issued. The appellant also reported the property was suitable for occupancy on June 1, 2019 with the construction completed on March 23, 2019. The property owner did not act as the general contractor and no non-compensated labor was performed on the property.

In support of the foregoing assertions in the petition, the appellant submitted a computer printout from the City of Chicago, "Building Permit & Inspection Records." The printout lists building permits issued: May 2015, for the erection of a new two-story residence with basement and a three-car garage; September 29, 2015 to "wreck and remove a two-story masonry residence"; February 4, 2016 a revised permit to decrease overall gross square footage from 8,359 to 7,594 square feet, remove two basement bathrooms and one powder room; and June 2016 install a burglar alarm. The foregoing printout also depicted eight inspections for new construction, plumbing, electrical and vent between October 2015 and May 2016.

The appellant also submitted a six-page City of Chicago, Department of Buildings, Building Permit Application dated December 1, 2015 which is described as a 'revision' to the original permit to decrease the size from 8,359 to 7,594 square feet and decrease the number/types of bathrooms. The document was signed by the appellant on January 25, 2016. A document in which the aldermanic representative of the subject property address acknowledged the revised permit and stated no objection thereto. Lastly, the appellant submitted a three-page, unsigned and undated "Contractor's Affidavit" related to the subject property depicting a total cost of $910,750.

Based on this evidence, the appellant requested a reduction in the subject's total assessment to $170,000, which would reflect a market value of $1,700,000, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $216,000. The subject's assessment reflects a market value of $2,160,000 or $284.44 per square foot of living area, land included, when using a dwelling size of 7,594 square feet and the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In response to the appeal, the board of review stated that the permits and other documentation supplied by the appellant are dated from 2015 to 2016. The board of review also noted there was no brief provided to further explain the argument. The board of review contends the most distant comparable sale property is .33 of a mile from the subject and applying the lowest price per square foot from this sales data, the subject at 4,977 square feet of living area, would have a value of approximately $2,613,821.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located in the same neighborhood code as the subject and the subarea or ¼ of a mile from the subject as depicted in the grid analysis. The parcels range in size from 6,187 to 8,350 square feet of land area which are improved with class 2-08, two-story dwellings of frame or masonry exterior construction. The dwellings are either 3 or 13 years old and range in size from 4,265 to 4,868 square feet of living area. Each comparable has a basement, 4½ bathrooms, central air conditioning, one to three fireplaces and either a 2-car, 2.5-car or 3-car garage. The comparables sold from April 2020 to July 2022 for prices ranging from $2,700,000 to $2,988,500 or from $575.18 to $654.23 per square foot of living area, including land.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant submitted evidence disclosing a land purchase price of $800,000 in March 2010 and expenditure of $910,750 with a contractor for the construction of the subject dwelling erected in March 2019, which results in a combined total 'investment' value for the subject property of $1,710,750 or $225.28 per square foot of living area, including land. The board of review submitted three recent sales from years 2020 to 2022 in support of the subject's current estimated market value of $2,160,000 or $284.44 per square foot of living area, including land. The foregoing is the sole evidence for consideration in this appeal by the Property Tax Appeal Board, with the parties' respective positions.

The Board has given reduced weight to the appellant's "recent" construction evidence in this appeal. The appeal concerns the subject's market value as of January 1, 2022. The Board finds the land purchase occurred nearly twelve years prior to the valuation date at issue and the dwelling was erected approximately 33 months prior to the valuation date at issue. On this record, the Board finds the appellant's entire market value evidence to be dated information given the lien date at issue herein and thus would be less likely to be indicative of "current" or calendar year 2022 market value.

The Board finds the best evidence of market value in the record to be the sales presented by the board of review reflecting more recent dates of sale for three class 2-08 properties located in relatively close proximity to the subject and which sold for prices ranging from $2,700,000 to $2,988,500 or from $575.18 to $654.23 per square foot of living area, including land. The Board recognizes that board of review comparable sales #1, #2 and #3, are from 36% to 44% smaller than the subject dwelling. In addition, the Board takes notice of accepted real estate valuation theory providing that all factors being equal, as the size of the property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Therefore, given the substantial differences in dwelling size between the subject and the three comparable sales presented by the board of review, the Property Tax Appeal Board finds the subject's current assessment of $216,000 reflecting a market value of $2,160,000 or $284.44 per square foot of living area, including land, is well supported. Based on this evidence and after considering appropriate adjustments to the best comparable sales for differences in dwelling size, among other differences, the Board finds the appellant did not demonstrate by a preponderance of the evidence that the subject was overvalued and a reduction in the subject's assessment 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 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 <u>PETITION AND EVIDENCE</u> 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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