



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

APPELLANT: Daniel Baker  
DOCKET NO.: 22-50375.001-R-1  
PARCEL NO.: 14-32-403-018-0000

The parties of record before the Property Tax Appeal Board are Daniel Baker, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, Ltd. 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:** \$30,000  
**IMPR.:** \$62,500  
**TOTAL:** \$92,500

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 consists of a 2-story multi-family building of masonry exterior construction with 3,250 square feet of building area. The building is approximately 133 years old and features a basement. The property has a 2,400 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on May 31, 2022 for a price of \$800,000. The appellant completed Section IV of the appeal petition disclosing the sale was not between related parties, the property sold by owner and was not advertised for sale, the sale was not due to foreclosure, and the sale was by contract for deed dated May 24, 2022. In support of the sale, the appellant submitted a copy of the settlement statement indicating the purchase was

financed by a lender. 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 \$92,500. The subject's assessment reflects a market value of \$925,000 or \$284.62 per square foot of building area, 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 located within the same assessment neighborhood code as the subject, three of which are 0.25 of a mile from the subject. The parcels range in size from 1,500 to 4,500 square feet of land area and are improved with 2-story or 3-story, class 2-11 multi-family buildings of masonry or frame exterior construction ranging in size from 2,833 to 3,940 square feet of building area. The buildings range in age from 28 to 143 years old. Each comparable has a basement, two of which are finished with an apartment. One comparable has central air conditioning. Two comparables each have a fireplace and a 2-car garage. The comparables sold from February to October 2022 for prices ranging from \$1,375,000 to \$2,000,000 or from \$383.14 to \$507.61 per square foot of building area, including land. Based on this evidence, the board of review requested the subject's assessment be sustained. Based on this evidence, the board of review requested the subject's assessment be sustained.

In written rebuttal, the appellant argued the best evidence of market value is the subject's sale compared to the raw unadjusted sales data presented by the board of review. The appellant contended these comparables differ from the subject in design, bedroom count, building size, condition, age, basement finish, and other amenities.

### **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 presented evidence of a May 2022 sale of the subject and the board of review presented four comparable sales in support of their respective positions before the Board. The Board gave little weight to the subject's sale due to the fact the sale did not have the elements of an arm's length transaction as it was not advertised or exposed on the open market. The Board gives less weight to the board of review's comparables #3 and #4, due to substantial differences from the subject in building size or age.

The Board finds the best evidence of market value in the record to be the board of review's comparables #1 and #2, which sold proximate in time to the assessment date and are more similar to the subject in building size, age, location, and features, although these comparables are 3-story buildings compared to the subject 2-story building and have smaller sites than the

subject, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. The comparables sold for prices of \$1,375,000 and \$1,400,000 or \$383.14 and \$431.44 per square foot of building area, including land, respectively. The subject's assessment reflects a market value of \$925,000 or \$284.62 per square foot of building area, including land, which is below the two best comparable sales in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is reflective of market value 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: \_\_\_\_\_

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

Daniel Baker, by attorney:  
Scott Shudnow  
Shudnow & Shudnow, Ltd.  
77 West Washington Street  
Suite 1620  
Chicago, IL 60602

COUNTY

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