



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

APPELLANT: Elizabeth Bishop
DOCKET NO.: 23-56936.001-R-1
PARCEL NO.: 17-20-307-023-0000

The parties of record before the Property Tax Appeal Board are Elizabeth Bishop, the appellant(s), by attorney Richard Shapiro, Attorney at Law in Evanston; 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: \$27,216
IMPR.: \$95,084
TOTAL: \$122,300

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 2023 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 multi-improvement property with two class 2-05 buildings attached to a 2-03 building that altogether were a former convent. Neither the appellant, board of review, or appraiser described any of the improvements very well, but there is a basement in at least one of the properties per the appraisal. The improvements were built in 1890. The appellant stated that one of the improvements is 2,000 square feet. The overall site is 9,072 square feet. The property is located in Chicago, West Chicago Township, Cook County. The property contains class 2-03 and class 2-05 improvements per 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 an appraisal estimating the subject property had a market value of \$850,000 as of May 2, 2022. The appraiser relied on a sales comparison approach of two parcels of vacant

land and one sale of a property on Racine Street located within a mile of the property that sold between June 2021 and December 2022 for \$180,000 (vacant land), \$230,000 (vacant land), and \$251,000 (contains an improvement, the “Racine property”). In an addendum, the appellant stated that the current improvements are in very poor condition and must be torn down. The appraiser stated the highest and best use of the site would be multi-family housing. The appraiser then multiplied the cost of the Racine property (Comparable #3 that has an improvement) by four and subtracted \$150,000 for lead and paint abatement of \$150,000 to arrive at the value of the subject. The appellant is requesting a total assessment of \$103,650.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$122,230. The subject's assessment reflects a market value of \$1,223,000. In support of its contention of the correct assessment the board of review submitted information on four comparable sales. The board of review stated that comparable #2 is located in the same “subarea” as the subject. The board of review did not state the distance of comparables #1, #3, and #4 to the subject. The board of review stated that only comparables #2 and #3 are located in the same general neighborhood as the subject, while comparables #1 and #4 are not. The unadjusted sales occurred from February 2021 to July 2023 for sales prices between \$392,000 and \$690,000. The sales price per square foot are between \$336.59 and \$394.76. The board of review is requesting that the current assessment be confirmed.

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 Board finds the best evidence of market value to be nothing submitted by either party. For the board of review, the comparables appeared to approximate some of the improvements located on the site, but since the appellant, board of review, and appraiser failed to neatly describe the size of any of the properties, it prevented a good comparison based on sales comparables. Also, only one of the comparables provided is located near the subject.

Turning to the appellant, the appraisal and the argument within is not persuasive. The Board acknowledges that this is a unique property that may not be the easiest to find comparables for, but this is precisely why a more rigorous and precise analysis is warranted. The appraiser used a “sales comparison” approach, but really only relies on two vacant sites and one site with an improvement. The appraisal then states that there will need to be a demolition and rebuilding based on the third comparable sale and then subtracts and abatement cost based on lead and asbestos. This appears to be more of a cost approach and an incomplete one based on evidence provided since there was no evidence of rebuilding cost or abatement cost provided. The entirety of the rebuilding cost is based on the sale of one property and not necessarily the cost to build such a property. The use of one sales comparable for a cost approach is improper. Also, the abatement and demolition costs are stated in a conclusory manner and not supported by any documentation or support. Therefore, the board found this appraisal to be limited, speculative,

an unpersuasive. Based on this evidence the Board finds 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: _____

October 20, 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

AGENCY

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