



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

APPELLANT: Joel Petersson
DOCKET NO.: 24-33403.001-R-1
PARCEL NO.: 14-19-423-047-0000

The parties of record before the Property Tax Appeal Board are Joel Petersson, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, 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: \$46,500
IMPR.: \$114,456
TOTAL: \$160,956

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 2024 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 dwelling of masonry exterior construction with 2,956 square feet of living area. The dwelling is approximately 22 years old. Features of the home include a full basement, central air conditioning, two fireplaces, and a 2-car garage. The property has a 3,000 square foot site and is located in Chicago, Lakeview Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on both unequal treatment in the assessment process as well as overvaluation concerning the subject property. In support of the overvaluation argument, the appellant submitted evidence disclosing the subject property was purchased on September 10, 2020 for a price of \$1,280,000. The appellant reported that the seller was Janice Salem, the parties to the transaction were not related, and the property sold through a realtor. The appellant

also indicated the property was advertised for sale through the Multiple Listing Service for an unknown period of time. The appellant also submitted a copy of the deed, purchase contract, and RealInfo property detail report confirming the sale price.

In support of the inequity argument the appellant submitted information on five equity comparables located in the subject's assessment neighborhood. The comparables consist of 2-story or 3-story class 2-78 dwellings of frame or frame and masonry exterior construction ranging in size from 2,692 to 3,112 square feet of living area. The homes range in age from 0 to 30 years old. Each dwelling has central air conditioning, one or two fireplaces, a full basement, and a 2-car garage. The comparables have improvement assessments ranging from \$60,514 to \$71,301 or from \$21.13 to \$25.00 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$69,022 or \$23.35 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$160,956. The subject property has an improvement assessment of \$114,456 or \$38.72 per square foot of living area. The subject's assessment reflects a market value of \$1,609,560 or \$544.51 per square foot of living area, land included, when applying the 10% level of assessment for class 2 property 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 equity comparables located within the subject's assessment neighborhood, three of which are within .25 of a mile of the subject. The comparables consist of 2-story class 2-78 dwellings of masonry exterior construction ranging in size from 2,746 to 2,930 square feet of living area. The homes range from 18 to 21 years old. Each dwelling has central air conditioning, one or two fireplaces, a full basement, and a 2-car garage. The comparables have improvement assessments ranging from \$107,341 to \$119,500 or from \$39.09 to \$42.08 per square foot of living area. One of the comparables sold in May 2024 for a price of \$1,780,000 or 648.22 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 Board gives little weight to the subject's sale, which occurred 39 months prior to the January 1, 2024 assessment date at issue. The Board finds that the lone sale presented by the board of review supports the subject's assessment. Based on this limited evidence and after considering adjustments to the comparable for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified on market value grounds.

The taxpayer also contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill. Admin. Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity, and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill. Admin. Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of nine equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #1, #2, and #3, which differ from the subject in age and/or design. The Board finds the parties' remaining comparables are similar to the subject in age, design, dwelling size, and features. These comparables have improvement assessments ranging from \$65,563 to \$119,500 or from \$24.35 to \$42.08 per square foot of living area. The subject's improvement assessment of \$114,456 or \$38.72 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified on equity grounds.

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:

May 19, 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 9-125 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

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