



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

APPELLANT: Jeff Davis  
DOCKET NO.: 20-48269.001-R-1  
PARCEL NO.: 17-04-424-055-1016

The parties of record before the Property Tax Appeal Board are Jeff Davis, the appellant(s), by attorney Max E. Callahan, of Siegel & Callahan, P.C. 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 **An Increase** 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:** \$14,701  
**IMPR.:** \$258,873  
**TOTAL:** \$273,574

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 2020 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 is an owner-occupied residential condominium unit in an approximately 14-year-old, 45-unit condominium building of masonry construction located in Chicago. North Chicago Township. The subject unit has 3,350 square feet of living area. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance. The appellant indicated that subject property is owner-occupied.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted a settlement statement disclosing the subject property was purchased on June 9, 2019, for \$2,550,000. The subject's sale price reflects a market value of \$761.19 per square foot of gross building area including land. In support of this argument, the appellant submitted a condominium real estate purchase and contract for the subject that lists the appellant as the purchaser, a closing statement and a warranty deed. The appellant provided information in Section IV–Recent Sale Data of the Residential Appeal that the sale of the subject was an arm's length transaction between unrelated parties; there was a realtor involved in the transaction and disclosed that the subject was advertised for sale. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price when applying the 2020 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

Furthermore, the subject property was the subject matter of an appeal before the Property Tax Appeal Board under Docket Number 2018-46364.001-R-1. In that appeal the Property Tax Appeal Board issued a decision lowering the total assessment of the subject property to \$273,574 on an agreed assessment amount reached by the parties and on the evidence submitted by the parties. The tax years 2018 and 2020 are within the same general assessment period for North Chicago Township and the appellant disclosed in section 1b of the submitted residential appeal form that the subject property is an owner-occupied residence<sup>1</sup>.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$269,223. The subject's assessment reflects a market value of \$2,692,230, or 803.65 when applying the assessment level of 10% as established by the Cook County Real Property Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted a condominium analysis with information on nine suggested comparable sales in the building. The sales occurred between 2017 and 2020. They sold for a total consideration of \$20,229,500. The board of review disclosed the units sold consisted of 16.6700% of all units in the building. The result yielded a full value of the property at \$121,352,729. Since the subject comprised 2.4900% of all the units in the building, the board of review suggested the market value of the subject to be \$269,223.

### **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).

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<sup>1</sup> Appellant indicated in 2018, 2019 and 2020 appeals for the subject that the subject was owner occupied. The Board entered a decision for both the subject's 2018 and 2019 for a total assessment of \$273,274 after a fully executed stipulation was submitted by the parties. All three years are within the same general assessment period.

The Property Tax Appeal Board finds that the assessment as established by the Board for the 2018 tax year should be carried forward to the tax year at issue subject only to equalization as provided by section 16-185 of the Property Tax Code.

Section 16-185 of the Property Tax Code provides, in relevant part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, **shall** remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.

35 ILCS 200/16-185. Additionally, "Standard of proof. Unless otherwise provided by law or stated in the agency's rules, the standard of proof in any contested case hearing conducted under this Act by an agency shall be the preponderance of the evidence." 5 ILCS 100/10-15. The Board takes official notice that it rendered a decision lowering the subject's assessment for tax year 2018 (86 Ill.Admin.Code §1910.90(i)), and that tax year 2018 and the instant tax year of 2020 are in the same general assessment period for North Chicago Township. The Board further finds that the subject is owner-occupied based on the appellant's response to Section 1b of the residential appeal form, which states that the subject is owner-occupied. The record contains no evidence indicating that the subject sold in an arm's-length transaction after the Board's decision for the 2018 tax year, or that the Board's decision for the 2018 tax year was reversed or modified upon review. For these reasons, the Board finds by a preponderance of the evidence, that the subject's assessment should be carried forward to the 2020 tax year, pursuant to section 16-185 of the Property Tax Code, to reflect the Board's decision for the 2018 tax year, plus the application of an equalization factor, if any<sup>2</sup>.

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<sup>2</sup> The final CCBOR total assessment amount for the 2020 lien year for this subject was less than the amount of the Property Tax Appeal Board decision lowering the assessment for the 2018 tax year. The Board's decision on this appeal based on the Rollover statute (35 ILCS 200/16-185) and Standing Order No.3 of the State of Illinois Property Tax Appeal Board entered on October 2, 2023, has resulted in **An Increase** in the subject's total assessment for this appeal.

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.

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Chairman

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Member

Member

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Member

Member

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Member

Member

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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: \_\_\_\_\_

July 15, 2025

\_\_\_\_\_  
Clerk of the Property Tax Appeal Board

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

Jeff Davis, by attorney:  
Max E. Callahan  
Siegel & Callahan, P.C.  
180 N. Wacker Dr  
Suite 400  
Chicago, IL 60606

COUNTY

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