



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

APPELLANT: Mallory House
DOCKET NO.: 21-30198.001-R-1
PARCEL NO.: 17-06-415-051-1001

The parties of record before the Property Tax Appeal Board are Mallory House, the appellant, by attorney Kevin Fanning, of Fanning Law, LLC 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 **A Reduction** 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: \$5,322
IMPR.: \$56,678
TOTAL: \$62,000

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 2021 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 residential condominium unit that is located on the 1st floor in a 3-story condominium building of brick exterior construction that contains 3 units. The condominium building was built in 2006 and is approximately 15 years old. The subject unit contains 2,246 square feet of living area and features three bedrooms, two full baths, one half bath, central air conditioning and assigned garage parking.¹ The subject unit has a 48.33% interest in the common elements of the condominium property. The property has a 3,239 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

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¹ The description of the subject property was gleaned from the appraisal submitted by the appellant.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on December 9, 2020, for a price of \$620,000. The appellant completed Section IV – Recent Sale Data of the appeal indicating the parties to the transaction were not related, the property was sold through a realtor and was advertised in the Multiple Listing Service (MLS) for a period of three months. To document the transaction the appellant submitted a copy of the MLS listing and a copy of the Settlement Statement which disclosed real estate commissions were paid to two entities.

In further support the appellant submitted an appraisal of the subject property estimating a market value of \$620,000 as of September 25, 2020. The appraisal was prepared by DeShawn Weaver-Drew, a Certified Residential Real Estate Appraiser who inspected the interior and exterior of the subject property. The appraiser reported the property rights appraised were fee simple interest and the purpose of the appraisal was to estimate the market value of the subject for a purchase transaction.

Under the sales comparison approach, the appraiser selected three comparable sales and two listings of residential condominium units located within .29 of a mile from the subject property. The comparable sales are condo units ranging in size from 1,992 to 2,550 square feet of living area and are 11 to 19 years old. Each comparable has three bedrooms, two full baths, one half bath, central air conditioning and assigned garage parking. Comparables #1, #2 and #3 sold November 2019 to September 2020 for prices ranging from \$617,000 to \$632,500 or from \$247.84 to \$309.74 per square foot of living area, including land. Comparables #4 and #5 have list prices of \$600,000 and \$675,000 or \$277.91 and \$281.25 per square foot of living area, including land, respectively. The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices from \$617,500 to \$628,610. Based on this analysis, the appraiser concluded a value for the appraised property of \$620,000 as of January 1, 2021.

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 \$71,046. The subject's assessment reflects a market value of \$710,460 or \$316.32 per square foot of living 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 a sales analysis prepared by Lilybeth Kafka, an analyst with the Cook County Board of Review. The analyst provided sales data on 2 residential units that sold in the subject's condominium property, one of which was the subject unit. The sales occurred in January 2021 and January 2011 for prices of \$620,000 and \$460,260, respectively, with a total adjusted consideration of \$1,080,620. The board of review analysis indicated these 2 units had a total ownership interest in the condominium property of 73.51%. The total adjusted consideration was then divided by the total percentage of interest of ownership in the condominium property for the units that sold to arrive at an indicated full value for the property of \$1,470,031. By applying the percentage of interest of ownership for the unit under appeal of 48.33% indicates a full value of \$710,466 and

an assessment of \$71,047, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The board of review also disclosed four properties in the subject area sold from \$425,000 to \$459,000 but did not provide any descriptive details about the properties.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the purchase of the subject property in December 2020 for a price of \$620,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellants completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a Realtor, the property had been advertised on the open market with the Multiple Listing Service and it had been on the market for three months. In further support of the transaction the appellant submitted a copy of the settlement statement and the MLS Listing. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction. Furthermore, the Board gives less weight to the board of review's sales analysis which included a sale from 2011 which is less likely to be reflective of the market value as of the January 1, 2021, assessment. Furthermore, the board of review's analysis included the sale of the subject property. Based on this record the Board finds the subject property had a market value of \$620,000 as of January 1, 2021. Since market value has been determined, the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. 86 Ill.Admin.Code §1910.50(c)(2)

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

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: _____

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

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