



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

APPELLANT: James Walsh
DOCKET NO.: 21-33231.001-R-1
PARCEL NO.: 14-31-410-022-0000

The parties of record before the Property Tax Appeal Board are James Walsh, the appellant(s), by attorney Nora Devine, of The Devine Law Group, 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: \$21,000
IMPR.: \$71,500
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 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 an approximately 24-year-old, two-story dwelling of masonry construction with 2,436 square feet of living area. Features of the building include a full basement, central air conditioning, and a two-car garage. The property has a 3,000 square foot site located in Chicago, West Chicago Township, Cook County. The property is a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity, market value based on comparable sales and overvaluation as the bases of the appeal. In support of the market value argument, the appellant submitted information on three comparable sales. The comparable properties sold between February 2020 and April 2021. The comparable properties ranged: in price between \$870,000 to \$975,000; in living area square footage between 2,464 to 2,798; and in sale price per square foot

between \$345.96 to \$385.38, including land. Based on this evidence, appellant requested a reduction in the subject's assessment to \$88,054.

In support of the overvaluation argument, the appellant submitted an appraisal estimating the subject property had a market value of \$925,000 as of January 1, 2021. The appraisal was prepared by Greg S. Fisher, Mitchell J. Perlow, and Harry M. Fishman of Property Valuation Services, licensed certified residential real estate appraisers. The appraisers relied on the sales comparison approach in their evaluation. For the sales comparison approach, the appraisers used sales of three comparable properties in Chicago, IL that took place between February 2020 and April 2021 for amounts ranging from \$870,000 to \$975,000, or from \$345.96 to \$385.38 per square foot of living area, land included in the sales prices. The appraiser adjusted the sales prices to account for differences between the subject and the comparables. Photographs of the subject dwelling's exterior and interior were included with the appraisal.

In support of the lack of equity argument, the appellant submitted information on four suggested equity comparable properties with varying degrees of similarities to the subject. These comparables are described as masonry construction dwellings. They range in age from 13 to 28 years; in size from 2,105 to 2,746 square feet of living area; and an improvement assessment of \$24.29 to \$27.95 per square foot of living area. The properties have two-car garages. The properties are located within a .76-mile radius of the subject property. The appellant requested the subject's total assessment be reduced to \$85,237.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$115,973. The subject's assessment reflects a market value of \$1,159,730 or \$476.08 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. In support of the assessment, the board of review submitted information about sales of four suggested comparable properties. The suggested comparables were sold between June 2021 and November 2021 for amounts ranging from \$829,000 to \$1,525,000 or between \$409.99 and \$706.02 per square foot of living area, land included in the sales prices.

The subject property has an improvement assessment of \$94,973 or \$38.99 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four suggested equity comparable properties with varying degrees of similarities to the subject. These comparables are described as masonry construction, two-story dwellings. They range in age from four to 131 years; in size from 2,022 to 2,202 square feet of living area; and an improvement assessment ranging from \$28.78 to \$61.20 per square foot of living area. These properties have full basements and two- or 2.5-car garages. The properties are located in the same subarea as the subject property. The board of review requested that the assessment be confirmed.

In rebuttal, the appellant submitted the Multiple Listing Service (MLS) data sheets for all of the board of review's suggested comparables and pointed out characteristic differences to the subject. The appellant argued that each of the board of review sale comparable properties were sold more than six months after the January 1, 2021 lien date and, therefore, should be excluded. The appellant reaffirmed its position that the 2021 assessed value for the subject property is excessive and that the total assessment should be reduced.

On December 18, 2025, both parties agreed to waive the hearing and have the Board render its decision based on the evidence.

Conclusion of Law

The taxpayer asserts that 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 taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 that the best evidence of the subject's market value is the appraisal submitted by the appellant. That appraisal employed the sales comparison approach and relied upon recent sales of three suggested comparable properties. The appraisal stated that the sale prices of the suggested comparable properties were adjusted to account for differences between them and the subject, taking into account such factors as gross living area, design/features, lot size, age, and location. In contrast, the board of review's evidence consists of unadjusted raw sales figures.

Based on the appraiser's final reconciliation, the Board finds the sales comparison approach is considered to be the most reflective of current market activity. Accordingly, the Board finds the subject property had a fair market value of \$925,000 as of the assessment date at issue. Since market value has been established, the level of assessment for the class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply here. (86 Ill.Admin.Code §1910.50(c)(2)). Based on the evidence, the Board therefore finds the appellant has proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment is justified. Since market value has been determined, the Board finds that the subject is now fairly and equitably assessed. See Central Nursing Realty, LLC v. Illinois Property Tax Appeal Board, 2020 IL App (1st) 180994, ¶¶ 34-36.

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

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