



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

APPELLANT: Melanie Watson
DOCKET NO.: 21-34249.001-R-1 through 21-34249.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Melanie Watson, the appellant, by Katherine Amari O'Dell, attorney-at-law of Amari & Locallo 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-34249.001-R-1	14-29-228-047-1001	13,125	13,547	\$26,672
21-34249.002-R-1	14-29-228-047-1002	13,672	14,156	\$27,828

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 is composed of two parcels (PINs) improved with a residential duplex condominium containing 1,954 square feet of living area located in a three-story building of brick exterior construction. The building is approximately 129 years old. Features of property include two bedrooms, two bathrooms, central air conditioning, and one fireplace. The property has a 3,125 square foot site located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-99 residential condominium under 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 \$545,000 as of January 1, 2021. The appraisal was prepared by Thomas Boyle Jr., Associate Real Estate Trainee Appraiser, and David Conaghan, an Illinois Certified General Real Estate Appraiser.

The purpose of the appraisal was to develop an opinion of market value of the fee simple interest to assist the appellant with an ad valorem tax assessment. The appraisers described the subject as a condominium of good quality construction and in average overall condition. The report described the property as having an actual age of 129 years with an effective age of 15 years. The property was inspected on December 14, 2021, and the report was signed on December 20, 2021. The appraisers further indicated in the addendum that there has not been a sale of the subject property in the past three years of the effective date of the report.

The appraisers developed the sales comparison approach to value using four sales of duplex condominiums that range in size from 1,500 to 1,800 square feet of living area. The condominiums range in age from 21 to 133 years old. Each comparable has central air conditioning, one fireplace, two bedrooms and two bathrooms. Three comparables have a one-car garage space and one comparable has one exterior parking space. These properties are located in Chicago from approximately .39 to .83 of a mile from the subject property. The sales occurred from May 2018 to April 2020 for prices ranging from \$486,000 to \$587,000 or from \$315.29 to \$326.11 per square foot of living area. Adjustments were made to the comparables for differences from the subject to arrive at adjusted prices ranging from \$493,700 to \$581,700. The appraisers estimated the subject property had a market value of \$545,000.

Based on this evidence the appellant requested the subject's assessment be reduced to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$93,998. The subject's assessment reflects a market value of \$939,980 or \$481.05 per square foot of living area when applying the 10% level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a document titled Condominium Analysis Results for 2022 prepared by Lucas Schumann. The document disclosed the subject's condominium building is composed of five PINs with the parcels under appeal having a 24% and 25% ownership interest in the condominium, respectively. The sales information provided by the board of review indicated PIN 14-29-228-047-1001 sold in November 2017 for a price of \$218,502 and PIN 14-29-228-047-1002 sold in November 2017 for a price of \$228,002. The analysis also indicated that the "Selected Sale" for PIN 14-29-228-047-1001 was January 1, 2021, for a price of \$490,000 and PIN 14-29-228-047-1002 was January 1, 2021, for a price of \$500,000. The board of review indicated that the total adjusted consideration for the two PINs under appeal was \$990,000. Dividing the total adjusted consideration by the combined percentage of ownership in the condominium common elements for subject PINs totaling 49% resulted in a full market value for the entire condominium of \$2,020,408. The board of review then calculated the fair market value of the PINs under appeal to be \$990,000 which results in a total combined assessed value of \$99,000 when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10%.

The board of review submission also included listings of three comparable sales composed of 2 bedroom/2 bathroom condominium units that range in size from 1,515 to 1,750 square feet of

living. These three properties sold for prices ranging from \$495,000 to \$596,203 or from \$309.38 to \$358.42 per square foot of living area.

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 appraisal submitted by the appellant estimating the subject property had a market value of \$545,000 or \$278.92 per square foot of living area as of January 1, 2021. The appraisers used information on four comparable sales and adjusted the sales for differences from the subject, which appear logical. The subject's assessment reflects a market value of \$939,980 or \$481.05 per square foot of living area, including land, which is above the appraised value.

The Board gives less weight to the analysis prepared by the board of review, which was based on the purported sales of the two PINs under appeal. The Board finds, however, the condominium analysis had conflicting dates of sale with divergent prices for the PINs under appeal with one sale date being November 22, 2017, and the second sale date being January 1, 2021. Furthermore, the appraisers stated within the appraisal report that there had not been a sale of the subject property in the three years prior to the effective date of the report. Based on this conflicting evidence regarding the sale of the subject PINs, the Board finds the condominium analysis presented by the board of review is not credible and is given little weight. Additionally, the three sales of condominium units presented by the board of review for prices ranging from \$495,000 to \$596,203 also undermines the board of review condominium analysis and are supportive of the appraised value presented by the appellant.

Based on this evidence the Board finds the subject property had a market value of \$545,000 as of January 1, 2021, and a reduction in the subject's assessment is 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

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: _____

March 18, 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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