



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

APPELLANT: Sean Murray  
DOCKET NO.: 21-37668.001-R-1  
PARCEL NO.: 14-20-124-013-0000

The parties of record before the Property Tax Appeal Board are Sean Murray, the appellant, by attorney Noah J. Schmidt, 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 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:** \$61,995  
**IMPR.:** \$177,905  
**TOTAL:** \$239,900

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 3-story dwelling of masonry exterior construction with 4,636 square feet of living area. The dwelling is approximately 10 years old. Features of the home include a full basement finished with a recreation room, central air conditioning, and a 2-car garage. The property has a 4,133 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation and assessment equity regarding the improvement. In support of the overvaluation argument the appellant submitted evidence disclosing the subject property was purchased on May 24, 2019, for a price of \$2,399,000. The appellant disclosed the transaction was not between family members or related corporations, the property was sold by a realtor and advertised through the Multiple Listing Service. To document

the sale the appellant submitted the Settlement Statement that disclosed real estate commissions were paid to two entities.

In support of the inequity argument the appellant submitted information on five equity comparables with the same neighborhood code as the subject. The comparables are improved with 3-story dwellings of masonry exterior construction ranging in size from 4,193 to 4,980 square feet of living area. The dwellings are 12 to 16 years old and have full basements. Each comparable has a 3-car or a 3.5-car garage. The comparables have improvement assessments ranging from \$132,125 to \$158,465 or from \$31.51 to \$32.40 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$252,071. The subject's assessment reflects a market value of \$2,520,710 or \$543.73 per square foot of living area, land included, when using the median level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The subject has an improvement assessment of \$190,076 or \$41.00 per square foot of living area, land included.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties. The comparables are improved with 2-story or 3-story dwellings of masonry exterior construction ranging in size from 4,002 to 4,456 square feet of living area. The dwellings are 4 to 17 years old and have full basements finished with recreation rooms. Each comparable has central air conditioning and a 2-car or a 3-car garage. Three comparables each have two fireplaces. The comparables sold from February to November 2019 for prices ranging from \$2,375,000 to \$2,750,000 or from \$532.99 to \$687.16 per square foot of living area, including land. The comparables have improvement assessments ranging from \$144,375 to \$221,000 or from \$32.40 to \$55.22 per square foot of living area, including land. The board of review reported the subject sold for \$1 in October 2021. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The appellant contends in part 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 May 2019 for a price of \$2,399,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant disclosed 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. In further support of the transaction the appellant submitted a copy of the settlement statement. 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. The Board also finds the board of review comparable sales do not overcome the arm's length sale of the subject property. In addition, one comparable sold less proximate to the assessment date at issue than the sale of the subject and one comparable sale is a 2-story dwelling when compared to the subject's 3-story dwelling. Based on this record the Board finds the subject property had a market value of \$2,399,000 as of January 1, 2021. Since market value has been determined the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. 86 Ill.Admin.Code §1910.50(c)(2)

The appellant 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).

After considering the reduction based on overvaluation, the Board finds a further reduction in the subject's assessment is not warranted based on uniformity.

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:

September 16, 2025



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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