



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

APPELLANT: Noreen Arralde  
DOCKET NO.: 21-38549.001-R-1  
PARCEL NO.: 14-05-410-022-1007

The parties of record before the Property Tax Appeal Board are Noreen Arralde, the appellant, by attorney Katherine Amari O'Dell, 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 **No Change** 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:** \$8,413  
**IMPR.:** \$32,586  
**TOTAL:** \$40,999

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 individual condominium unit within a three-story seven-unit condominium building of masonry exterior construction with 1,524 square feet of living area.<sup>1</sup> The building was built in 1910 and is approximately 111 years old. The property has a 7,512 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on April 12, 2022 for a price of \$175,000. The appellant reported that the sellers were Wanda Mahoney and Mary Theresa

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<sup>1</sup> Details not reported by the appellant were drawn from the Multiple Listing Service sheet submitted by the appellant.

Edwards and the property sold through a realtor. The appellant also indicated the property was advertised for sale through the Multiple Listing Service (MLS) for a period of 150 days. The appellant also submitted copies of the MLS sheet and the settlement statement associated with the sale confirming the sale price of \$175,000 and the sale date of April 12, 2022. 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 \$40,999. The subject's assessment reflects a market value of \$409,990 when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of submitted a document entitled Condominium Analysis Results for 2021 in which it used two comparable sales to estimate the value of the condominium building. The sales occurred on December 26, 2019 and June 1, 2021 for prices of \$438,500 and \$476,111, for a total consideration for the two sales of \$914,611. The board of review analysis indicated these two units had a combined 28% ownership interest in the condominium. Dividing the total consideration by the percentage of ownership in the condominium resulted in a full value of the condominium building of \$3,266,467 which results in a total combined assessment for the building of \$326,647 when applying the 10% Ordinance level of assessment for class 2-99 property. The board of review's analysis indicates that the subject unit has a 14% ownership interest in the building, that would result in a total assessment for the subject of \$45,731, which is greater than the subject's current assessment. 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant submitted evidence of an April 2022 sale of the subject property and the board of review present two sales within the condominium building to support their respective positions before the Property Tax Appeal Board. The Board has given less weight to the sale of the subject, which occurred approximately 16 months after the January 1, 2021 assessment date at issue.

The Board finds the best evidence of market value to be the two comparable sales submitted by the board of review. These comparables sold in December 2019 and June 2021, more proximate to the assessment date at issue than the sale of the subject, for prices of \$438,500 and \$476,111. Dividing the total consideration of the two sales of \$914,611 by the percentage of ownership in the condominium results in a full value of the condominium building of \$3,266,467 which results in a total combined assessment for the building of \$326,647. Applying the subject unit's ownership interest of 14% to the entire building value results in a market value of \$457,305,

which is greater than the subject's estimated market value reflected by its assessment of \$409,990. Based on this record the Board finds a reduction in the subject's assessment is not 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.

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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: March 18, 2025

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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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