



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

APPELLANT: Miorita O'Connell
DOCKET NO.: 21-42878.001-R-1
PARCEL NO.: 14-18-207-026-0000

The parties of record before the Property Tax Appeal Board are Miorita O'Connell, the appellant, by attorney Andreas Mamalakis, of the Law Offices of Andreas Mamalakis in Kenosha, 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: \$59,445
IMPR.: \$12,205
TOTAL: \$71,650

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 improved with a 1.5-story, multi-family dwelling of frame construction with 2,559 square feet of living area located in Chicago, Lake View Township, Cook County. The dwelling is 124 years old. Features include a partial, unfinished basement, a two-car garage, two full bathrooms, and two half baths. The subject is located on a 6,605 square foot site. It is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts 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 \$600,000, land included, as of January 1, 2021. The appraiser relied on the sales comparison approach and used data from sales of four suggested comparable properties. The sales took place between January 2020 and November 2020, for amounts ranging from \$520,500 to \$877,500 or from

\$243.00 to \$255.53 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 interior and exterior were included with the appraisal.

The board of review submitted its "Board of Review Notes on Appeal" stating that the subject's total assessment was \$92,000. The subject's assessment reflects a market value of \$920,000, or \$359.52 per square foot of living area, land included, when using the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The board of review also submitted a grid sheet with information about three suggested comparable properties. Those properties were sold between May 24, 2019, and August 4, 2021, for amounts ranging from \$490,000 to \$931,000, or between \$191.86 and \$421.27 per square foot of living area, land included in the sales prices.

This matter was set for hearing before an Administrative Law Judge on December 1, 2025, but the parties agreed to waive the hearing and stand on the documentary evidence they had submitted.

Conclusion of Law

The appellant contends that the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of an appeal, the value of the property must be proved 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.

This Board gives diminished weight to the appraisal submitted by the appellant primarily because of the high gross and/or net adjustment percentages for the comparable properties upon which the appraiser relied. A gross adjustment percentage is calculated by first determining the sum of the absolute values of all adjustments made by the appraiser to account for differences between the subject and the comparable. The total is then divided by the sale price of the comparable to determine the gross adjustment percentage for the comparable. A net adjustment percentage is calculated in the same manner except that an upward adjustment is treated as a positive number and a downward adjustment is treated as a negative number.¹

Each of the appraisal's four comparables has a net adjustment percentage between 20% and 24% and a gross adjustment percentage between 32% and 37%. These high net and gross adjustment percentages raise doubts about whether these comparables are similar enough to the subject to be of use in determining the subject's market value. Furthermore, a map that is part of the appraisal indicates that the fourth comparable used in the appraisal is over a mile from the

¹ For example, if the appraiser makes an upward adjustment of \$20,000 and a downward adjustment of \$10,000, the gross adjustment amount is \$30,000, and the net adjustment amount is \$10,000. Assuming the comparable was recently sold for \$200,000, the gross adjustment percentage would be 15% and the net adjustment percentage would be 5%.

subject property. This Board therefore gives no weight to the appraisal's fourth comparable, but it gives some weight to the appraisal's other three comparables and the appraiser's conclusions.

This Board finds that the board of review's first comparable should be given no weight because of the superior construction of its dwelling and features of that dwelling that the subject dwelling lacks. This Board gives some weight to the board of review's comparables two and three, however, because of the considerable similarities between their dwellings and the subject dwelling, with comparable two given the greatest weight. Board of review comparable two sold for \$371.39 per square foot of living area, and board of review three sold for \$191.86. The latter amount is less than the adjusted sales prices of the appraiser's first three comparables, which were \$264.32, \$210.24, and \$207.93 per square foot of living area, land included in the sales prices. Board of review comparable three lends support to the appellant's assertion that a reduction is warranted.

Accordingly, the appellant has shown overvaluation by a preponderance of the evidence, so a reduction in the subject's assessment is warranted. This Board concludes from the evidence that the subject's fair market value as of January 1, 2021, was \$280.00 per square foot of living area, land included, or \$716,500, rounded, and the proper assessment is 10% of that, or \$71,650.

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:

April 21, 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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