FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Gregory Mullins
DOCKET NO.: 21-55084.001-R-1
PARCEL NO.: 17-34-410-043-0000

The parties of record before the Property Tax Appeal Board are Gregory Mullins, the appellant(s), by attorney Thomas J. Thorson, of Raila & Associates, P.C. 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:	$33,072
IMPR.:	$66,423
TOTAL:	$99,495

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 9,449 square foot parcel of land improved with two improvements and built in 1890. Improvement #1 is a three-story dwelling of brick construction with 6,074 square feet of living area. Improvement #1 is a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance. Improvement #2 is a three-story dwelling of brick construction with 5,957 square feet of living area. Improvement #2 is a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance. The Board finds the total gross building area is 12,031 square feet [1]based on the property card submitted by the board of review. The subject property is located in Chicago, South Chicago Township, Cook County. The record disclosed that the subject property was not owner-occupied during the lien year.

[1] The appraisal erroneously disclosed the total gross building area as 10,666 square feet and did not offer an explanation for the conflicting figures or documentation to support its own calculation.

The appellant contends overvaluation as the basis of the appeal. In support of the overvaluation argument, the appellant submitted an appraisal estimating the subject property had a market value of $745,000 as of January 1, 2020. The appraisal was prepared by Jennifer Soto-Burrell, a licensed certified residential real estate appraiser. The appraiser physically inspected the interior and exterior of the subject property on April 23, 2020. Photographs of the subject dwelling's exterior and interior were included with the appraisal. The appraisal utilized the income and sales comparison approaches.

The appraiser asserts that adequate retrospective market data was difficult to locate but she was able to "develop a credible opinion of market value as of the effective date by utilizing older sale and listing data" and "interviewed area agents/brokers and property owners familiar with the neighborhood in the three-year period leading up to the effective date." For the income approach, the appraiser relied upon the rent roll from the subject property as well as the rental income from twelve suggested rental comparables within the subject property. The appraiser imputed a market rent of $750 per month for the custodian-occupied unit and the four other vacant units, of which, one is a one-bedroom unit. The rental income ranged from $675 to $925 per month with total annual income of $107,400. After making adjustments for characteristics such as size, condition, location and building features, the appraiser estimated the subject would rent for a gross potential income of $107,400. The appraiser applied a 10% vacancy and collection loss results in an Effective Gross Income of $96,660 and applied an expense ratio of 40% to the subject's EGI results in a Net Operating Income of $57,996. After making the appropriate deductions and applying a weighted capitalization rate of 7.77%, she opined that the value of the subject property was $745,000 (rounded).

For the sales approach, the appraiser relied on three suggested sales comparables that sold between April 2018 and January 2019, for amounts ranging from $510,000 to $850,000, or between $52,500 and $70,833 per unit before adjustments. The appraiser adjusted the sales prices to account for differences between the comparables and the subject. After applying the adjustments, the appraiser determined that the subject's value was $58,000 per unit, for a total for 12 units of $695,000 (rounded). Reconciling the income and sales comparison approach results, the appraiser determined that primary consideration was given to the income capitalization approach and minimal emphasis on the sales comparison approach. The appraiser determined the subject's value was $745,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $99,493. The subject's assessment reflects a market value of $994,930 or $82.70 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 3 property of 10%. The board of review asserts that the appellant's appraisal is from 2020 and the appraiser's suggested sale comparables should be accorded *de minimis* weight due to the date of sales being between 24 and 56 months prior to the lien date. Additionally, the board of review asserts that the subject is an income-producing apartment building and the appraisal "did not provide any income/expense or rent roll data for any of its suggested sale comparables." Additionally, the board of review asserts that the appraisal "did not provide any income/expense data for the subject property nor did it provide document numbers or grantors/grantees for the comparable sales." Furthermore, the board of review challenges the appraiser's income capitalization approach which "does not

examine any market data whatsoever" and "offers no support/data for a 10% vacancy and collection loss but the appraiser applied a blanket 40% operating expense ratio without examining any market data." The board of review asserts that the appraisal "deducts real estate taxes as an expense, which is improper."

In support of its contention of the correct assessment, the board of review submitted copies of information on seven suggested comparable sale properties from CoStar Group. The board of review did not cite these suggested properties on a prescribed form in accordance with Section 16-165 of the Property Tax Code (35 ILCS 16-165), and with the Board's Rules 1910.30(c) and 1910.80 (86 Ill.Admin.Code §1910.30(c) and §1910.80).

Prior to the scheduled hearing date, the parties agreed to waiving hearing and have the Board render its decision based on the evidence submitted.

Conclusion of Law

The board of review's evidence consisted of copies of seven suggested comparable sale properties from CoStar Group, a widely known source of real estate data. The Board finds that the board of review did not submit this evidence on a prescribed form in accordance with Section 16-165 of the Property Tax Code, and with Rules 1910.30(c) and 1910.80, supra. The Board's Standing Order No. 2, entered February 14, 2023, with an effective date after February 28, 2023, provides for parties before the Board to be subject to sanctions for failure to use prescribed forms. The board of review submitted its evidence in May of 2024, long after the effective date of Standing Order No. 2. Consequently, the Board gives no weight to the board of review's sales comparables evidence for its failure to comply with the Property Tax Code, the Board's Rules and Standing Order No. 2.

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 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board has given less weight to the value conclusion in the appellant's appraisal due to the lack of data included to support its analysis. The Board finds that the subject is an income-producing apartment building and the appraiser did not provide any income/expense or rent roll date for any of its suggested sale comparables. Additionally, the Board finds that the appraiser did not provide any income/expense data for the subject property nor did it provide document numbers or grantors/grantees for the comparable sales, because according to the appraiser's own disclosure, "adequate retrospective market data was difficult to locate." Furthermore, the Board questions the appraiser's income capitalization approach which does not utilize any market data to support it or its application of a 40% operating expense ratio. For these reasons, the Board does not find the appraiser's conclusion of value to be a reliable indicator of value and the Board will instead consider the raw sales data presented in the appraisal.

The Board gives minimal weight to the appraisal's sales comparables. The appraisal does not disclose the square footage for its suggested sales comparables. The appraisal provided insufficient characteristics for its suggested sales comparables for the Board to consider. Additionally, the Board gives minimal weight to the appraisal's sale comparable #1 as it was sold in 2016 according to the special warranty deed contained within the record, which is inconsistent to what is reported in the appraisal. Accordingly, the Board therefore finds the appellant has not proven, by a preponderance of the evidence, that the subject is overvalued, and 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.

Chairman

Member

Member

Member

Member

DISSENTING:

C E R T I F I C A T I O N

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: November 17, 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 9-215 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Gregory Mullins, by attorney:
Thomas J. Thorson
Raila & Associates, P.C.
230 West Superior Street
Suite 500
Chicago, IL 60654

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602