



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

APPELLANT: Melanie Watson
DOCKET NO.: 22-36701.001-R-1 through 22-36701.002-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
22-36701.001-R-1	14-29-228-047-1001	13,125	15,599	\$28,724
22-36701.002-R-1	14-29-228-047-1002	13,671	16,225	\$29,896

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 2022 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 two adjacent parcel numbers (PINs) improved with a residential condominium unit located in a three-story building of brick exterior construction that is approximately 129 years old. The unit has 1,954 square feet of living area, central air conditioning, two bedrooms, two bathrooms, and one fireplace. The condominium has a 3,125 square foot site 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 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., an Associate Real Estate Trainee Appraiser, and David Conaghan, a Certified General Real Estate Appraiser. The

purpose of the appraisal was to provide an opinion of the market value of the real estate to establish an equitable ad valorem tax assessment. The fee simple property rights were appraised. The highest and best use of the property was determined to be the property's present use as a condominium.

The appraisers described the subject property as having two levels and located in a duplex condominium. They indicated the actual age of the property is 129 years old with an effective age of 15 years. The appraisers further indicated the subject is a condominium of good quality construction and to be in average overall condition. The report indicated that Thomas Boyle, Jr., conducted an interior and exterior inspection on December 14, 2021, while David Conaghan conducted an exterior inspection on the same date.

The appraisers developed the sales comparison approach to value using four comparable sales composed of residential condominium units located in duplex condominium buildings of brick exterior construction that range in age from 21 to 133 years old. The condominium units range in size from 1,500 to 1,800 square feet of living area. Each comparable has central air conditioning, one fireplace, two bedrooms, two bathrooms, and one garage space or one parking space. The comparables are located from .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. The appraisers adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$493,700 to \$581,700. The appraiser estimated the subject had a market value of \$545,000 as of January 1, 2021. The appellant requested the subject's total combined assessments be reduced to \$54,500 to reflect the appraised value.

The report indicated that the median prices for homes for 2021 are expected to increase in a range from 8.3% to 19.6% for Illinois and 6.9% to 16% for the Chicago PMSA (Primary Metropolitan Statistical Area).

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

In support of its contention of the correct assessment the board of review submitted a document titled Condominium Analysis Results for 2022 for the subject's condominium complex. The document indicated the subject parcels had a combined 49% ownership interest in the condominium common elements. The analysis had a column with the heading "Sales Information" indicating the subject's two PINs sold on November 22, 2017, for prices of \$218,502 and \$228,002, respectively, for a total combined price of \$446,504. However, the analysis also had a column with the heading "Selected Sale" indicating the subject PINs sold on January 1, 2021, for prices of \$490,000 and \$500,000, respectively. Using this information the analysis indicated the subject condominium had a total value of \$2,020,408 that would result in a total assessment \$202,041. Applying the subject's combined percentage of ownership interest in the common elements to the market value finding would result in a total market value of

\$990,000 and a total combined assessment of \$99,000, which is greater than the subject's total assessment.

The board of review also submitted limited information on three sales that appear to be residential condominium units each with two bedrooms and two bathrooms that range in size from 1,515 to 1,750 square feet of living area. Two comparables were reported to have sold "2 weeks ago" and "3 weeks ago", respectively, and one comparable sold on November 18, 2022, for prices ranging from \$495,000 to \$596,203 or from \$309.38 to \$358.41 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 evidence in the record supports a reduction in the subject's assessment.

The appellant submitted an appraisal 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 appraisal estimate of value was based on the sales comparison approach to value using four sales that 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. The report did indicate that the median prices for homes for 2021 were expected to increase in a range from 8.3% to 19.6% for Illinois and 6.9% to 16% for the Chicago PMSA, therefore, based on the effective date of the appraisal and the date of sales for the comparables used in the report, the Board finds the subject's market value as reflected in the appraisal should be adjusted upward. The board of review documentation did include limited information on three sales of residential condominium units for prices ranging from \$495,000 to \$596,203 or from \$309.38 to \$358.41 per square foot of living area. The subject, which is composed of two PINs, has a combined total assessment of \$93,998 reflecting a market value of \$939,980 or \$481.05 per square foot of living area, which is significantly greater than the appraised value, the four comparable sales in the appraisal, and the three sales submitted by the board of review, supporting the conclusion the subject property is overvalued.

The Board gives little weight to condominium analysis presented by the board of review as sales information for the subject PINs under appeal differs from the selected sale data used by the board of review to calculate the value of the condominium and the subject property. The difference in data detracts from the veracity and credibility of the analysis.

Based on this evidence, after giving most weight to the appraisal submitted by the appellant and some weight to the raw sales submitted by the board of review, the Board finds 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

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

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