



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

APPELLANT: Sara Lyons
DOCKET NO.: 22-40586.001-R-1
PARCEL NO.: 14-18-419-008-0000

The parties of record before the Property Tax Appeal Board are Sara Lyons, the appellant, by attorney Dora Cornelio, 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: \$40,500
IMPR.: \$24,400
TOTAL: \$64,900

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 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 a 2-story multi-family building of masonry exterior construction with 3,406 square feet of building area. The building is approximately 114 years old. Features include a basement with finished area, central air conditioning, two fireplaces, and a 2-car garage. The property has a 4,500 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based both on overvaluation and assessment inequity regarding the improvement. In support of the overvaluation argument, the appellant submitted evidence disclosing the subject property was purchased on January 17, 2023 for a price of \$649,000. The appellant completed Section IV of the appeal petition disclosing the parties to the sale were not related, the property sold using a realtor and was advertised for sale through the Multiple Listing

Service, and the sale was not due to foreclosure or by contract for deed. In support of the sale, the appellant submitted a copy of the settlement statement disclosing payment of a realtor's commission.

In support of the assessment inequity argument, the appellant submitted information on five equity comparables located within the same assessment neighborhood code as the subject. The comparables are improved with 2-story, class 2-11 multi-family buildings of masonry, frame, or frame and masonry exterior construction ranging in size from 3,315 to 3,474 square feet of building area. The buildings range in age from 103 to 143 years old. Each comparable has a basement, four of which have finished area. One comparable has central air conditioning, one comparable has a fireplace, and four comparables each have a 2-car, a 2.5-car, or a 3-car garage. The comparables have improvement assessments ranging from \$14,200 to \$32,897 or from \$4.22 to \$9.50 per square foot of building area.

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 \$91,794. The subject's assessment reflects a market value of \$917,940 or \$269.51 per square foot of building area, land included, when using the 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 \$51,294 or \$15.06 per square foot of building area.

In support of its contention of the correct assessment the board of review submitted information on eight comparables presented in two grid analyses as #1 through #4, which are renumbered as #1 through #8 for ease of reference. The comparables are located within the same assessment neighborhood code as the subject, two of which are 0.25 of a mile from the subject. The comparables are improved with 2-story or 3-story, class 2-11 multi-family buildings of masonry or frame exterior construction ranging in size from 3,192 to 3,828 square feet of building area. The buildings range in age from 58 to 143 years old. Each comparable has a basement, two of which have finished area. Two comparables have central air conditioning and four comparables have a 1.5-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$14,200 to \$82,875 or from \$4.22 to \$22.68 per square foot of building area.

Six comparables have sites ranging in size from 3,125 to 8,700 square feet of land area and sold from January 2020 to October 2022 for prices ranging from \$1 to \$1,150,000 or from \$0 to \$314.72 per square foot of building area, including land. The board of review also reported the subject sold in March 2022 for a price of \$733,425. Based on this evidence the board of review requested the subject's assessment be sustained.

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 appellant presented evidence of sale of the subject in January 2023 for a price of \$649,000 and the board of review disclosed the subject sold in March 2022 for a price of \$733,425 and presented six comparable sales. The Board gave less weight to the March 2022 sale as the board of review did not present any evidence to support the March 2022 sale as an arm's length transaction. The Board also gave less weight to the board of review's comparables, which differ substantially from the subject in design or age and/or sold less proximate in time to the assessment date. Moreover, the board of review's comparables #5 and #6 sold for \$1 indicating these were not arm's length sales reflective of market value.

The Board finds the best evidence of market value to be the purchase of the subject property in January 2023 for a price of \$649,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV disclosing the parties to the transaction were not related, the property was sold using a realtor, and 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 or to refute the contention that the purchase price was reflective of market value. Based on this record the Board finds the subject property had a market value of \$649,000 as of January 1, 2022. 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). The Board finds the appellant did not meet this burden of proof and no further reduction for assessment inequity is warranted.

The record contains a total of thirteen equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #1 and the board of review's comparables #1, #2, #3, and #5, due to substantial differences from the subject in design or age.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2 through #5 and the board of review's comparables #4, #6, #7, and #8, which are more similar to the subject in design, building size, age, location, and some features, although four lack finished basement area, six lack central air conditioning, and three lack a garage, which are features of the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables have improvement assessments ranging from \$18,960 to \$57,690 or from \$5.46 to \$18.05 per square foot of building area. The subject's improvement assessment \$24,400 or \$7.16 per square foot of building area, as reduced for

overvaluation herein, falls within the range established by the best comparables in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and no reduction in the subject's assessment for assessment inequity 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: _____

August 19, 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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