FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Allison Hickson
DOCKET NO.: 22-44844.001-R-1
PARCEL NO.: 14-20-417-050-1002

The parties of record before the Property Tax Appeal Board are Allison Hickson, the appellant(s), by attorney Nicholas T. McIntyre, of Much Shelist, 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 ***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:	$12,700
IMPR.:	$43,800
TOTAL:	$56,500

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 property is a 3,090 square foot site located in Chicago, Lakeview Township, Cook County. The subject property consists of an approximately seven years old, three-story, three-unit, residential condominium building of masonry construction. The dwelling features include a full basement, two bathrooms, air-conditioning, and a detached garage. 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 October 20, 2021, for a price of $565,000. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the subject was sold by a realtor, was advertised for sale on a multiple listing service for three months, was not sold subject to a foreclosure action or using a contract for deed, and the parties were not related. In addition, the appellant provided a settlement statement documenting the sale of the subject, as well as a realtor condominium purchase and sale contract. The appellant's petition discloses that the subject is owner-occupied. 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 assessor's total valuation for the subject unit as $60,328 and the total assessment for the subject building of $219,971. The subject's assessment reflects a market value of $2,199,710, land included, when applying the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment the board of review submitted a condominium sales analysis based on the recent sale of all three units in subject building. Unit 1001, holding 39.80% ownership, sold on September 17, 2021, for $975,000, Unit 1002, the subject, holding 27.40% ownership sold on October 27, 2021, for $565,000, and Unit 1003, holding 32.80% ownership, sold on June 2, 2021, for $745,500. The board of review then calculated percentage of ownership of 100%, resulting in a full market value of $2,285,500, divided by the subject's ownership percentage disclosing the subject's fair market value of $626,227 with a total assessed value of $62,623 when applying the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. Based on this analysis, the board requested confirmation of the subject's assessment as the subject's current assessment reflects a market value below the subject's market value based on the three recent sales within the subject.

Conclusion of Law

The appellant contends overvaluation. This property was the subject of an appeal with the Property Tax Appeal Board for the 2021 tax year under Docket Number 2021-41004.001-R-1. In that appeal the Property Tax Appeal Board issued a decision lowering the total assessment of the subject property to $56,500 based on a recent sale. The Property Tax Appeal Board finds that the assessment as established by the Board for the 2021 tax year should be carried forward to the tax year at issue subject only to equalization as provided by section 16-185 of the Property Tax Code.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) states in part:

> If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.

The Property Tax Appeal Board issued a decision reducing the subject's assessment for the 2021 tax year. The 2023 assessment year is within the same general assessment period and the appellant's petition discloses that the subject is owner-occupied. The record contains no evidence indicating the subject property sold in an arm's length transaction after the Board's 2021 decision or that the decision of the Property Tax Appeal Board has been reversed or modified upon review. The Board finds by a preponderance of the evidence that the subject's assessment should be carried forward to the 2023 tax year, pursuant to section 16-185 of the Property Tax Code, to reflect the Board's decision for the 2021 tax year, plus the application of an equalization factor, if any.

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: February 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 9-125 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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