



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

APPELLANT: Carol Johnson
DOCKET NO.: 22-48315.001-R-1
PARCEL NO.: 14-33-400-042-1341

The parties of record before the Property Tax Appeal Board are Carol Johnson, the appellant(s), by attorney Nora Devine, of The Devine Law Group, LLC 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: \$1,068
IMPR.: \$17,211
TOTAL: \$18,279

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 is condominium unit in an approximately 50-year old, 546 unit residential condominium building that is located on a 40,700 square foot site in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance. The record disclosed that the subject property was owner-occupied during the lien year.

The appellant asserts overvaluation as the basis for the appeal. The appellant also submitted a brief in which he asserts that adjustments should be made to the sales prices of these units. No further rationale or basis for this adjustment was submitted in this record. In support of the overvaluation argument, the appellant submitted an appraisal estimating the subject property had a market value of \$150,000 as of September 22, 2020. The appraisal was prepared by Marco J. Mallard, a licensed certified residential real estate appraiser. The appraiser utilized the sales

comparison approach in their evaluation. For the sales comparison approach, the appraiser used sales of three comparable properties in different buildings in Chicago, IL that took place between January 2020 and September 2020 for amounts ranging from \$150,000 to \$165,000, or from \$328.00 to \$362.64 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 exterior and interior were included with the appraisal.

Additionally, in support of the overvaluation argument, the appellant submitted evidence disclosing the subject property was sold on December 22, 2020 for a price of \$150,000. The appellant submitted into evidence copies of a settlement statement. Section IV Recent Sale Data of the appeal form confirmed: the sale date and price; the transfer was not between family or related corporations and was sold by owner; the subject was not advertised for sale; and the subject was not sold due to a foreclosure action. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect 9.16% of the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject as \$18,279 which reflects a market value of 182,790 when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. In support of its contention of the correct assessment, the board of review submitted its Condominium Analysis for 2022, which is based upon sales of 135 other units in the subject's building. The total consideration for the 135 sales was \$25,865,242, and the 135 units represented a 27.7500% ownership interest in the common element. This translated to a value for the entire building of \$93,208,079. Multiplying this by the subject unit's ownership interest of .2070% amounted to a fair market value for the subject unit of \$192,941. This reflects an assessed value of \$19,294, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

On December 17, 2025, prior to the scheduled hearing date, the parties agreed to waive hearing and have the Board render its decision based on the previously submitted.

Conclusion of Law

The appellant argues that there should be downward adjustments of 9.16% to the recent sale of the subject or the appraised fair market value. The appellant, however, submitted no evidence to support its contention that downward adjustments should be made to these values or that it should deviate from the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. Therefore, the Board gives no weight to this argument.

The taxpayer contends overvaluation as the basis of the appeal. When overvaluation is claimed, the appellant has the burden of proving the value of the property by a preponderance of the evidence. *Cook Cnty. Bd. of Review v. Prop. Tax Appeal Bd.*, 339 Ill. App. 3d 529, 545 (1st Dist. 2002); *National City Bank of Michigan/Illinois v. Prop. Tax Appeal Bd.*, 331 Ill. App. 3d 1038, 1042 (3d Dist. 2002) (citing *Winnebago Cnty. Bd. of Review v. Prop. Tax Appeal Bd.*, 313 Ill. App. 3d 179 (2d Dist. 2000)); 86 Ill. Admin. Code § 1910.63(e). Proof of market value may consist of an appraisal, a recent arm's length sale of the subject property, recent sales of comparable properties, or recent construction costs of the subject property. *Calumet Transfer, LLC v. Prop. Tax Appeal Bd.*, 401 Ill. App. 3d 652, 655 (1st Dist. 2010); 86 Ill. Admin. Code §

1910.65(c). Real property taxes . . . which are authorized by law to be assessed against and levied upon real property shall be assessed against and levied upon each unit and the owner's corresponding percentage of ownership in the common elements as a tract, and not upon the property as a whole. 765 ILCS 605/10(a). Having considered the evidence presented, the Board finds that the evidence indicates a reduction is not warranted.

The Board concludes that the best evidence of the subject's market value is the Condominium Analysis for 2022 submitted by the board of review utilizing sales of 135 comparable units, including the subject unit. Each of these was a sale of a condominium unit in the same building as appellant's unit and includes the 2021 sale of the subject unit. In its determination of the proper assessment, the board of review added the total compensation from these 135 sales together, and the total was \$25,865,242. The board of review also determined that the 135 condominium units together constitute a 27.7500% interest in the building and calculated the full value of the building as \$93,208,079. The board of review then multiplied this figure by the subject unit's .2070% interest in the building as a whole and determined that the unit should be assessed at \$19,294, reflecting a market value of \$192,941, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The Board gives less weight to the appraisal report as it uses comparables sales from other buildings without adjustments for differences in ownership percentages, common elements, and amenities of the other buildings. The Board finds that the subject's total assessed value is \$18,279 per the board of review decision letter.

The Board also gives little weight to the subject's sale due to lack of information regarding the arm's length nature of the sale. The appellant's pleadings state that the subject was not advertised for sale by the owner and that realtors were not involved in the transaction per the pleadings and the settlement statement. The evidence does not show that the subject was advertised for sale on the open market which is an important element of determining whether an arm's length transaction occurred. The appellant disclosed that the buyer was a long-term tenant of the seller and this could offer a possible explanation as to why it was not advertised for sale but there is limited information to explain/describe what was involved in the sale by the owner. Therefore, the Board finds that appellant failed to meet the requisite burden of proof, and a reduction in the subject's assessment is not warranted.

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: _____

October 20, 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

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