



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

APPELLANT: Susan McMahon
DOCKET NO.: 23-41243.001-R-1
PARCEL NO.: 13-35-114-008-0000

The parties of record before the Property Tax Appeal Board are Susan McMahon, 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 **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: \$11,253
IMPR.: \$52,750
TOTAL: \$64,003

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 2023 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 an owner-occupied two-story dwelling of frame and masonry exterior construction with 2,526 square feet of living area.¹ The dwelling is approximately 18 years old. Features of the home include a full basement, with finished area, 3½ bathrooms, a fireplace, and a two-car garage.² The property has a 3,750 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The parties to this appeal agree the subject dwelling contains 2,526 square feet of living area. The appellant's appraiser included a schematic drawing with the report and determined a slightly larger dwelling size of 2,544 square feet of living area. The Board finds for purposes of this decision utilization of the agreed upon dwelling size is sufficient for analysis.

² The parties to this appeal agree the subject dwelling lacks central air conditioning, despite that the appellant's appraiser included this as a feature of the subject property. For purposes of this decision, the Board has accepted the assertion the subject home lacks central air conditioning.

The appellant contends both overvaluation and lack of assessment inequity as the bases of the appeal.

As part of the overvaluation argument, the appellant completed in part Sec. IV – Recent Sale Data of the appeal petition reporting that the subject property was purchased by the appellant on July 7, 2020, for a price of \$560,000. The appellant further reported the property was purchased from Sara C. Franco and Patrick L. O’Connor, that the parties to the transaction were not related family members or corporate affiliates, the property was sold through a Realtor with Domain Realty, and the property was advertised with the Multiple Listing Service (MLS) for an unknown period of time. Furthermore, the property was not sold due to a foreclosure action nor was the property sold using a contract for deed. In further support of the recent sale, the appellant submitted a copy of the Settlement Statement reiterating the date of sale and sale price. Moreover, this document references commissions being distributed to two entities, namely, Domain Realty and Redfin Corporation. A copy of the sales contract was also supplied which reiterated the purchase price.

As a further basis of the overvaluation argument, the appellant submitted an appraisal of the subject property with an opinion of value as of June 11, 2020, of \$585,000. The appraisal was prepared by Dayna L. Lucas, a Certified Residential Real Estate Appraiser, in connection with the purchase transaction for the lender/client, Huntington National Bank, in Columbus, Ohio. The appraiser in the report acknowledged the contract price of \$560,000, indicated the transaction appeared to be arm’s length, and cited to the MLS listing of March 4, 2020 with an “original and final list price [of] \$609,900.”

Lucas reported the subject dwelling was built in 2005 and has an effective age of 10 years. The appraiser also reported the full finished basement is a walkout-style and the dwelling features central air conditioning and included photographs refer to HVAC as well.³ Under the cost approach to value, Lucas estimated the subject had a site value of \$280,000. The appraiser estimated the replacement cost new of the improvements to be \$365,220. The appraiser estimated physical depreciation to be \$73,044 resulting in a depreciated improvement value of \$292,176. The appraiser also estimated the site improvements had a value of \$15,000. Adding the various components, Lucas estimated the subject property had an estimated market value of \$587,200 under the cost approach to value.

Using the sales comparison approach to value, Lucas analyzed four sales and two listings of comparable properties located from .27 to .83 of a mile from the subject. The parcels range in size from 3,125 to 4,425 square feet and are each improved with a 1.5-story or a 2-story traditional or cottage dwelling. The homes range in age from 6 to 128 years old and range in size from 1,556 to 2,700 square feet of living area. Each comparable has a basement with finished area, central air conditioning, 1½ to 2½ bathrooms, and a two-car garage. Three comparables each have a fireplace. The sales occurred for comparables #1 through #4 from March to April 2020 for prices ranging from \$584,900 to \$636,000 or from \$226.57 to \$348.68 per square foot

³ In the Section III description of the subject, the appellant reported the home does not have air conditioning and the board of review likewise indicated the home lacks air conditioning.

of living area, including land. The listings depicted asking prices of \$597,400 and \$649,000, respectively, or \$383.93 and \$240.37 per square foot of living area, including land.

Next, Lucas applied adjustments to each sale property for date/time of sale and for differences in age for each sale and one of the listings. Adjustments were also applied for differences in bathroom count, basement size and/or basement finish, outdoor amenity differences, kitchen upgrades and/or bath upgrades. Five of the six comparables were given either \$15,000 or \$25,000 downward adjustments for "kitchen upgrades" and the same five comparables were given from \$5,000 to \$15,000 downward adjustments for bath upgrades. Through this process, the appraiser set forth adjusted sales prices for the comparables ranging from \$577,200 to \$636,280, including land. As part of the addendum, Lucas stated that all comparables were "gut rehabs and are in the same condition as the subject."

In reconciliation, Lucas determined the sales comparison approach was most reliable and also asserted the cost approach provided further support to the opinion of value of \$585,000 as of June 11, 2020.

In support of the inequity argument, the appellant submitted information on five equity comparables along with property characteristics sheets which were used to update/correct bathroom count information. The comparables are located in the same neighborhood code as the subject. The comparables consist of class 2-78 two-story dwellings of frame, masonry or frame and masonry exterior construction and which are 2 to 60 years old. The comparables range in size from 2,081 to 2,872 square feet of living area. Four comparables have full basements, three of which have finished area, and comparable #5 has a concrete slab foundation. Four comparables have central air conditioning and the homes have from 1 to 3½ bathrooms. One home has a fireplace and each comparable has from a one-car to a two-car garage. The comparables have improvement assessments ranging from \$21,500 to \$30,825 or from \$10.20 to \$12.93 per square foot of living area.

Based on this equity evidence, the appellant requested a reduced improvement assessment of \$28,569 or \$11.31 per square foot of living area reflecting the median of the equity comparables presented. The appellant requested a reduced total assessment of \$39,822 which would reflect a market value of approximately \$398,220 or \$157.65 per square foot of living area, including land.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$64,003. The subject's assessment reflects a market value of \$640,030 or \$253.38 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The subject property has an improvement assessment of \$52,750 or \$20.88 per square foot of living area.

In response to the appeal, the board of review submitted two grid analyses with both sales and equity data. For ease of reference, the second grid of comparables have been renumbered as #5 through #8. The comparables are located within the same neighborhood code as the subject and the subarea or ¼ of a mile from the subject. The comparable lots range in size from 3,150 to 6,900 square feet of land area and are improved with class 2-78 two-story dwellings of frame,

masonry or frame and masonry exterior construction. The comparables range in size from 2,330 to 2,838 square feet of living area and range in age from 14 to 16 years old. Each comparable has a full basement, with finished area, central air conditioning, 2½ or 3½ bathrooms, and a two-car garage. Seven comparables have one or two fireplaces. Comparables #1 through #4 sold from August 2020 to January 2022 for prices ranging from \$686,000 to \$810,000 or from \$241.72 to \$347.64 per square foot of living area, including land. As part of the data, the board of review reports that the subject property sold in October 2020 for a price of \$560,000 or \$221.69 per square foot of living area, including land. The eight comparables have improvement assessments ranging from \$50,300 to \$75,242 or from \$20.96 to \$26.51 per square foot of living area.

Based on this evidence, the board of review requested confirmation of the subject's assessment on both market value and equity grounds.

Conclusion of Law

The appellant contends, in part, that 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted on market value grounds.

The appellant supplied data related to the 2020 sale prices of the subject property for \$560,000 along with an appraisal opining a market value for the subject as of June 2020 of \$585,000, and the board of review supplied four comparable sales, in support of the parties' respective positions before the Property Tax Appeal Board.

As to the 2020 sale price of the subject property, the Board has given little weight to the subject's sale price which is dated in this appeal. The Board finds the sale occurred more than two years prior to the lien date at issue herein of January 1, 2023. Moreover, the Board finds that the board of review supplied two sales that occurred more proximate in time to the lien date. Likewise, the Board has given reduced weight to board of review sales #3 and #4, each of which occurred in 2020, again dates more remote in time to the valuation date herein of January 1, 2023.

Next, as to the appellant's appraisal, the Board finds the report with a final value conclusion as of June 2020 of \$585,000 is not a credible or reliable indicator of the subject's estimated market value as of January 1, 2023. In particular, upon examining the comparables utilized in the report along with the adjustments, the Board finds that due to a lack of similarity between most of the comparables and the subject property the appraiser made multiple extraordinary adjustments such as for differences in age, dwelling size, kitchen upgrades and/or bathroom upgrades, despite also stating that the comparables were all "gut rehabs and are in the same condition as the subject." The Board finds the appraiser's assertion of the similarity of condition between the subject and comparables is inconsistent with the adjustments applied in the sales comparison analysis of the report. Therefore, given the questionable nature of these adjustments, the Board

finds the appraiser's value conclusion is not well-supported in the report by the comparable sales presented and is also presents a dated opinion of value as of January 1, 2023.

Based on this record, the Board finds the best evidence of market value to be board of review comparable sales #1 and #2 which are both similar to the subject in location, design, age, bathroom count, dwelling size, and some features. These comparables necessitate downward adjustments for air conditioning, which is reportedly not a feature of the subject property. These most similar comparables sold in January 2021 and January 2022 for prices of \$735,000 and \$810,000 or for \$315.45 and \$347.64 per square foot of living area, including land. The subject's assessment reflects a market value of \$640,030 or \$253.38 per square foot of living area, including land, which is below the best comparable sales in this record both in terms of overall value and on a per-square-foot basis, including land. Based on this evidence and after considering adjustments to the best comparable sales for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not justified on grounds of overvaluation.

Additionally, the taxpayer contends assessment inequity as another 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 a reduction in the subject's assessment is not warranted.

The parties submitted a total of thirteen (13) equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's five equity comparables as well as board of review comparable #3, as these dwellings are significantly older and/or differ substantially in size from the subject dwelling from approximately 11% to 16%.

The Board finds the best evidence of assessment equity consists of board of review comparables #1, #2 and #4 through #8, which are each similar to the subject in location, age, dwelling size, bathroom count, foundation type and some features. Each of these comparables have air conditioning, which has been determined to not be a feature of the subject dwelling suggesting that the comparables should be given downward adjustments. These seven comparables have improvement assessments ranging from \$50,300 to \$64,319 or from \$20.96 to \$24.70 per square foot of living area. The subject's improvement assessment of \$52,750 or \$20.88 per square foot of living area falls within and at the lower end of the range established by the best comparables in this record in terms of overall improvement assessment and below the range on a per-square-foot of living area basis. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified based upon a lack of assessment uniformity.

In conclusion, having examined the entire record, the Board finds that no change in the subject's assessment is warranted based either upon grounds of overvaluation or assessment inequity.

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: July 15, 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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