



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

APPELLANT: Elizabeth Machaj  
DOCKET NO.: 23-43735.001-R-1  
PARCEL NO.: 17-05-123-033-0000

The parties of record before the Property Tax Appeal Board are Elizabeth Machaj, the appellant, by attorney Max E. Callahan, of Siegel & Callahan, 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 **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:** \$17,622  
**IMPR.:** \$96,161  
**TOTAL:** \$113,783

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 a 3-story multi-family building of masonry exterior construction with 4,668 square feet of building area. The building is approximately 128 years old. Features include a basement, six apartment units (consisting of 2 1-bedroom/1-bathroom units, 2 2-bedroom/2-bathroom units duplex down units, and 2 3-bedroom/2-bathroom duplex up units) and a 2-car garage. The property has a 2,937 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 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 \$1,005,000 as of January 1, 2021. The appraisal was prepared by William L. Shulman and Mitchell J. Perlow, certified general real estate appraisers, to establish market value as of January

1, 2021. The appraisers developed the sales comparison approach and did not develop a cost approach or an income approach, stating this type of property is typically owner operated and is not an investment property. Under the sales comparison approach, the appraisers selected five comparable sales of 6-unit multi-family buildings. The comparables are depicted on a map in relation to the subject and have varying degrees of similarity to the subject in building size, unit mix, site size, age, and other features. The comparables sold from May 2018 to June 2021 for prices ranging from \$1,019,000 to \$1,200,000, or from \$178.77 to \$228.05 per square foot of building area, including land. The appraisers adjusted the comparables for market conditions and for differences from the subject to arrive at a value for the subject of \$1,005,000 as of January 1, 2021. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$113,783. The subject's assessment reflects a market value of \$1,137,830 or \$243.75 per square foot of building area, including land, when applying the level of assessment for class 2 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 information on three comparable sales located on the same block or 0.25 of a mile from the subject. The comparables are improved with 3-story, class 2-11 multi-family buildings. The comparables have varying degrees of similarity to the subject in building size, age, site size, and features and sold from February 2021 to February 2023 for prices ranging from \$987 to \$1,350,000 or from \$0.19 to \$293.94 per square foot of building area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

### **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 appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant submitted an appraisal and the board of review submitted three comparable sales in support of their respective positions before the Board. The Board gives less weight to the appraised value conclusion as it states a value as of January 1, 2021 rather than the January 1, 2023 assessment date and relies on four sales that occurred in 2018, 2019, and 2020, more remote in time from the January 1, 2023 assessment date. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value as of the assessment date and the Board will instead consider the raw sales data presented in the appraisal and by the board of review.

The record contains eight comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #2 through #5, which sold less proximate in time to the assessment date than the other sales in this record. The Board gives less weight to the board of review's

comparable #3, which sold for considerably less than the other sales in this record, suggesting this sale may be an outlier.

The Board finds the best evidence of market value to be the appraisal sale #1 and the board of review's comparables #1 and #2, which sold more proximate in time to the assessment date and are similar to the subject in location and some features but have varying degrees of similarity to the subject in building size, age, and other features, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables sold for prices ranging from \$1,019,000 to \$1,350,000 or from \$178.77 to \$293.94 per square foot of building area, including land. The subject's assessment reflects a market value of \$1,137,830 or \$243.75 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not 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: June 16, 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Elizabeth Machaj, by attorney:  
Max E. Callahan  
Siegel & Callahan, P.C.  
141 W. Jackson  
Suite 1795  
Chicago, IL 60604

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602