



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

APPELLANT: Patrick McGinnis
DOCKET NO.: 23-43921.001-R-1
PARCEL NO.: 18-16-300-005-0000

The parties of record before the Property Tax Appeal Board are Patrick McGinnis, the appellant(s), by attorney Christopher G. Walsh, Jr., of Walsh Law, 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 **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: \$11,500
IMPR.: \$46,500
TOTAL: \$58,000

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 20,000 square foot site. It is improved with a 67-year-old, two-story, single-family dwelling of frame and masonry construction, with 2,954 square feet of living area. The subject property is located in Countryside, Lyons Township, Cook County and is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of its market value argument, the appellant completed Section IV – Recent Sale Data in its Residential Appeal Form indicating the subject property was purchased on September 18, 2020, for \$550,000, the sale did not occur between family members, was sold by a realtor, and was advertised for sale with the multiple listing service. In its brief, the appellant posits that the sale of the subject property three years prior to the lien year is the best evidence of market value. The appellant included copies of

two separate written decisions from the Board decided in 2002 and 2006 where sales occurring three years prior to the lien year at issue were determined to be the best evidence of market value. Also, the appellant submitted copies of the Settlement Statement. The Settlement Statement lists payments made to both the buyer's and the seller's real estate brokerages and attorney's fees. The appellant also submitted a copy of the board of review's written decision reflecting its final total assessment for the subject property of \$58,000. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$55,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total valuation assessment for the subject property of \$58,000 and an improvement assessment of \$46,500. The valuation assessment reflects a market value of \$580,000, or \$196.34 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on three suggested sales comparables. Each comparable was improved with a two-story, single-family residence of either frame or frame and masonry construction. The comparables ranged from 2,280 to 3,290 square feet of living area and from 67 to 69 years of age. The board of review's comparable #1 sold in July of 2021 for \$475,000, or \$208.33 per square foot of living area. In addition, the board of review included information in its grid analysis indicating the subject property sold in November of 2020 for \$550,000, or \$186.19 per square foot of living area.

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 meet* this burden of proof and a reduction in the subject's assessment *is* warranted.

The appellant raised an argument that the Board should refer to its prior decisions in determining market value. "Under the principles of a de novo proceeding, the Property Tax Appeal Board shall not presume the action of the board of review or the assessment of any local assessing officer to be correct." 86 Ill.Admin.Code §1910.63(a). Regarding its prior decisions, the Board does not treat its prior decisions as binding precedent in the same way that a court would. As a quasi-judicial administrative body, the Board's decisions are based on the specific evidence presented in each case. The ultimate outcome of any appeal will depend on the evidence and arguments submitted for the tax year in question as such, except in very specific situations, any prior PTAB decision has no bearing on the Board's decision on a pending appeal.

The Board finds the best evidence of market value to be the purchase of the subject property in September of 2020 for a price of \$550,000. The appellant completed Section IV – Recent Sale Data in its Residential Appeal Form indicating the subject property was purchased on September 18, 2020, for \$550,000, the sale did not occur between family members, was sold by a realtor, and was advertised for sale with the multiple listing service. In addition, the appellant submitted copies of the Settlement Statement that lists payments made to both the buyer's and the seller's

real estate brokerages and the seller's attorney's fees. Furthermore, since the board of review provided sales information for only one sale comparable property, the sale of the subject property in September of 2020 is the best evidence of market value in the evidence submitted by the parties.

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. Based on this record the Board finds the subject property had a market value of \$550,000 as of January 1, 2023. Since market value has been determined, a reduction in the subject's assessment commensurate with the appellant's request is appropriate.

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

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