FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: the Benefit of Daniel D. Dolan Gift Trust Agreement
DOCKET NO.: 23-48589.001-R-1 through 23-48589.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are the Benefit of Danie Daniel D. Dolan Gift Trust Agreement for, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
23-48589.001-R-1	17-22-110-135-1260	6,032	162,387	$168,419
23-48589.002-R-1	17-22-110-135-1481	124	3,329	$3,453
23-48589.003-R-1	17-22-110-135-1482	124	3,329	$3,453

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 is a condominium unit with two garage spaces in an approximately 15-year old, 688 unit residential condominium building that is located on a 53,824 square foot site in Chicago, South 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 not owner-occupied during the lien year.

The appellant contends overvaluation as the basis of the appeal. In support of the overvaluation argument, the appellant submitted an appraisal estimating the subject property had a market value of $1,600,000 as of January 1, 2021. The appraisal was prepared by Marco Malard, a licensed certified residential real estate appraiser. The appraiser physically inspected the interior and exterior of the subject property on January 6, 2023. Mr. Malard relied on the sales

comparison approach in which he used sales of three comparable properties in Chicago, IL that took place between September 2019 and May 2020 for amounts ranging from $1,600,000 to $1,890,000, or from $533.33 to $647.26 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. The appellant also submitted a copy of the MLS listing for the subject. The appellant disclosed that the subject property and two garage spaces were originally listed on September 20, 2020 for $1,900,000 and cancelled on November 11, 2021 at a reduced price of $1,600,00 after receiving no offers. The appellant further disclosed that a one-year rental agreement was reached on April 1, 2022 for $7,500 per month, which was later renewed. The appellant also submitted the subject's board of review decision letter dated April 9, 2024, which disclosed a total assessed value for property number 17-22-110-135-1260 of $168,419.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject as $175,325 which reflects a market value of 1,753,250 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 107 units in the subject's building. The total consideration for the 107 sales was $43,546,514, and the 107 units represented a 15.2362% ownership interest in the common element. This translated to a value for the entire building of $285,809,545. Multiplying this by the subject unit's ownership interest of .5899% amounted to a fair market value for the subject unit of $1,685,990. This reflects an assessed value of $168,599 when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

The matter proceeded to hearing on November 20, 2025. At hearing, the appellant requested to consolidate docket number 23-48589 with docket numbers 21-38653 and 22-48326 regarding the same subject property and within the same triennial. The board of review voiced no objection. The administrative law judge granted consolidating the three cases for hearing purposes only. The appellant presented the testimony of Mr. DaShawn Weaver-Drew, the appraiser who holds an SRA designation. Mr. Weaver-Drew testified he is an Illinois certified real estate appraiser and prepared the appraisal with no objection from the board of review to Mr. Weaver-Drew being called as a witness.

Mr. Weaver-Drew testified that he employed the sales comparison approach to estimate a total market value for the subject. Mr. Weaver-Drew testified that he selected these comparables by looking at the subject development. Mr. Weaver-Drew testified that the best indication of value is to find a comparable sale that is in the same development or a very proximate development that is similar in age to the subject. Mr. Weaver-Drew testified that two of the comparables are located in the building adjacent to the subject. Mr. Weaver-Drew testified to each of the three sales comparables that were utilized in the appraisal and that he made adjustments for condition, amenities, and size. The board of review rested on the evidence previously submitted.

On cross examination, the board of review analyst testified that the board of review submitted a lot of comparable sales, all indicating a reduction is warranted.

Conclusion of Law

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 107 comparable units. Each of these was a sale of a condominium unit in the same building as appellant's unit. In its determination of the proper assessment, the board of review added the total compensation from these 107 sales together, and the total was $43,546,514. The board of review also determined that the 107 condominium units together constitute a 15.2362% interest in the building and calculated the full value of the building as $285,809,545. The board of review then multiplied this figure by the subject unit's .5899% interest in the building as a whole and determined that the unit should be assessed at $168,599, reflecting a market value of $1,685,990, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. However, the Board finds that the subject's total assessed value is $168,419 per the board of review decision letter dated April 9, 2024. The Board gives less weight to the appraisal report as it uses comparable sales from another building without adjustments for differences in ownership percentages, common elements, and amenities of the other buildings. The Board also gives less weight to the documentation of a recent sale attempt. The appellant's pleadings include an MLS disclosing the sale of the subject was cancelled on November 11, 2021 which is not indicative of arm's length sale as the sale was never completed. Since the total assessed value of $168,419 for the subject is less than $168,599, 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:

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: November 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 9-215 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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