FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: McKennan Tucker
DOCKET NO.: 24-27034.001-R-1
PARCEL NO.: 17-06-432-036-1002

The parties of record before the Property Tax Appeal Board are McKennan Tucker, the appellant, by attorney Jeremy Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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:	$9,502
IMPR.:	$54,098
TOTAL:	$63,600

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 2024 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 property is a 3,277 square foot site located in Chicago, Rogers Park Township, Cook County. The subject property consists of an approximately 14-year-old, three-unit residential condominium building. One unit comprising 33.3300% ownership is the subject of this appeal. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing that the subject property was purchased on July 30, 2020, for a price of $518,000. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the subject was sold by a realtor, was advertised for sale on a multiple listing service for 24 days, was not sold subject to a foreclosure action or using a contract for deed, and the parties were not related. In addition, the appellant provided a settlement statement documenting

the sale of the subject. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total valuation for the subject of $63,600 which reflects a market value of $636,000 land included, when applying the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The county board of review responded that the subject was correctly assessed and in defense of the assessment submitted a condominium analysis calculating the estimated fair market value of the subject unit based on two sales from January 2021 to May 2022 for between $610,000 and $670,000. Total consideration from those sales of $1,280,000, divided by the percentage of interest in the units sold, resulted in a full market price for the entire development of $1,919,904 or a total assessed value of $191,990. The board of review requested that the assessment be confirmed.

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 has not met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds that the sale of the subject property in 2020 is too remote in time from the January 1, 2024, lien date to be considered reliable evidence of the subject's current market value. Pursuant to 86 Ill. Admin. Code § 1910.65(c)(4) and consistent with the holding in Calumet Transfer LLC v. Illinois Property Tax Appeal Board, 401 Ill. App. 3d 652 (1st Dist. 2010), the Board may consider as evidence of market value not only sales of the subject, but sales of comparable properties, to determine whether the subject was sold at fair cash value. In this case, the appellant did not submit any comparable sales evidence. Ultimately, the burden rests with the appellant to demonstrate overvaluation by a preponderance of the evidence. Based solely on the subject's 2020 sale and in the absence of supporting comparable sales, the Board finds that the appellant has failed to satisfy this burden. Accordingly, 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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