FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Kathleen Odoherty
DOCKET NO.: 24-34017.001-R-1 through 24-34017.006-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Kathleen Odoherty, the appellant(s), by attorney Michael R. O'Malley, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
24-34017.001-R-1	14-29-301-086-1001	19,054	26,914	$45,968
24-34017.002-R-1	14-29-301-086-1002	19,054	26,914	$45,968
24-34017.003-R-1	14-29-301-086-1003	19,066	26,930	$45,996
24-34017.004-R-1	14-29-301-086-1004	19,066	26,930	$45,996
24-34017.005-R-1	14-29-301-086-1005	19,066	26,930	$45,996
24-34017.006-R-1	14-29-301-086-1006	19,066	26,930	$45,996

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 subject property is improved with a condominium building containing six units. The building is approximately 28 years old, and it is located on a 6,149 square foot site in Chicago, Lakeview Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation as the ground for the appeal, specifically based on recent sales. The appellant submitted a legal brief, four comparable sales from within the subject

building, and MLS data sheets. The appellant asserts that the sales occurred between January 2021 and July 2023.

The sales suggested by the appellant were for a total 66.70% interest in the condominium and are as follows: PIN 14-29-301-086-1001 sold in March 2021 for $395,500; PIN 14-29-301-086-1003 sold in July 2023 for $540,000; PIN 14-29-301-086-1004 sold in January 2021 for $464,000; and PIN 14-29-301-086-1006 sold in April 2022 for $455,000. The appellant claims that the total sales price for the four sales was $1,459,000. Dividing this value by the percentage of interest of the units sold results in a value for the building of $2,188,391.

The appellant argued that there should be a 10% reduction in this total market value to account for personal property. Based on this evidence and argument, the appellant requested a reduction in assessed value to $196,955.

The board of review submitted its "Board of Review Notes on Appeal" showing a total assessment for the subject of $261,384, However, the evidence contains the board of review level appeal decision which reflects a 2024 total assessment of $275,920. This assessment reflects a market value of $2,759,200 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 Results for 2024. This included information about recent sales of three units in the subject building. These three sales were also submitted as comparables by the appellant.

Those sales suggested by the board of review were for a total 50% interest in the condominium and are as follows: PIN 14-29-301-086-1001 sold in April 2021 for $395,500; PIN 14-29-301-086-1003 sold in July 2023 for $540,000; and PIN 14-29-301-086-1006 sold in April 2022 for $455,000. The board of review asserts that the total sales price for the three sales was $1,390,500. The board of review divided this by the percentage of ownership of the units sold of 50% to find a full value of the six units of $2,781,000, indicative of a total assessed value of $278,100, which is greater than the actual assessed value of $275,920.

The board of review also notes in the evidence that the sale of PIN 14-29-301-086-1004, a sale suggested by the appellant but not used by the board of review, actually took place in 2020. In support, the board of review includes a Warranty Deed and an MLS data sheet indicating that the sale of that PIN was recorded in January of 2021, but the sale actually occurred in December of 2020.

Conclusion of Law

The appellant asserts overvaluation as a ground for appeal. When market value is the basis of the appeal, the taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 that the appellant failed to meet this burden of proof.

The appellant and the board of review used three of the same sales figures. The Board affords less weight to the additional sale that was offered by the appellant because it occurred in 2020 and is too remote in time to be persuasive. The three sales used by both parties occurred between 2021 and 2023 and the Board finds that the total consideration for the recent sales of the three units used by both parties was $1,390,500, that the full value of the units appealed was $2,781,000, which supports an assessed valuation of $278,100, under the 10% level of assessment provided in the Cook County Real Property Assessment Classification Ordinance. This is higher than the actual assessed value of $275,920 for the subject property. The Board gives no weight to the appellant's personal property reduction. The appellant did not specify the items of personal property allegedly involved in the sales, nor did it address the factors used by Illinois courts to determine whether property is real or personal. See A & A Market v. Pekin Ins. Co., 306 Ill. App. 3d 485, 488 (3d Dist. 1999). Therefore, the appellant failed to show that there should be a 10% reduction for personal property. The Board finds the appellant failed to show overvaluation by a preponderance of the evidence, so an assessment reduction 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: October 20, 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

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