FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Susan McMahon
DOCKET NO.: 24-43778.001-R-1
PARCEL NO.: 13-35-114-008-0000

The parties of record before the Property Tax Appeal Board are Susan McMahon, the appellant, 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:

LAND:	$13,875
IMPR.:	$56,125
TOTAL:	$70,000

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 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 consists of a 2-story dwelling of frame and masonry exterior construction with 2,526 square feet of living area. The dwelling is approximately 22 years old. Features of the home include a full basement with finished area, 3½ bathrooms, a fireplace, and a 2-car garage.[1] The property has a 3,750 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables, along with property characteristics printouts that were used to verify or correct the

[1] The Board finds the subject dwelling has 3½ bathrooms and its basement has a finished area as provided in the board of review's grid analysis and was not refuted by the appellant.

data provided within the grid analysis. The comparables are located within the same assessment neighborhood as the subject with "n/a" described in the grid analysis for the comparables' proximity to the subject. The comparables consist of class 2-78 2-story dwellings of frame, masonry or frame and masonry exterior construction ranging in size from 2,108 to 2,445 square feet of living area. The dwellings are from 1 to 61 years old. Four comparables have partial or full basements, and comparable #4 has a crawl space foundation. The comparables have from 1 to 3 full bathrooms with four having 1 additional half bathroom. Four comparables each have central air conditioning, three comparables each have a fireplace, and three comparables have either a 1-car, a 1.5-car or a 2-car garage. The comparables have improvement assessments ranging from $22,929 to $29,496 or from $9.38 to $13.78 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of $27,811 or $11.01 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $70,000. The subject property has an improvement assessment of $56,125 or $22.22 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located within the subject's assessment neighborhood and within approximately ¼ of a mile from the subject. The comparables consist of class 2-78 2-story dwellings of frame exterior construction ranging in size from 2,382 to 2,685 per square feet of living area. The dwellings are from 3 to 11 years old. Two comparables have full basements, and comparable #3 has a slab foundation. The comparables have 2 or 3 full and 1 additional half bathrooms, central air conditioning, and either a 2-car or a 3-car garage. Two comparables each have a fireplace. The comparables have improvement assessments ranging from $55,438 to $82,850 or from $23.27 to $30.86 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight equity comparables for the Board's consideration, all of which have significant differences to the subject due to their newer/older aged dwellings, dissimilar foundation types and/or other features when compared to the subject. Nevertheless, the Board gives less weight to the appellant's comparables #1, #2 and #3 along with the board of review's comparable #1 which are from 19 to 39 years newer or older in age than the subject dwelling.

The Board gives more weight to the appellant's comparables #4 and #5 as well as the board of review's comparables #2 and #3 which are located within the subject' assessment neighborhood

and are closer in age to the subject dwelling. However, the comparables have from 5% to 17% smaller dwelling sizes, the appellant's comparables are 12 or 13 years older in age than the subject, three comparables have fewer bathrooms and fireplace counts, and two comparables lack basement foundations, suggesting upward adjustments for these differences are needed in order to make them more similar to the subject. Conversely, downward adjustments are required to the board of review's comparables #2 and #3 since the dwellings are 11 or 15 years newer in age to the subject dwelling. Nonetheless, these four comparables have improvement assessments ranging from $29,050 to $66,203 or from $13.62 to $27.70 per square foot of living area. The subject's improvement assessment of $56,125 or $22.22 per square foot of living area falls within the range established by the most similar comparables in the record. Based on this record and after considering adjustments to the most similar comparables in the record for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395 (1960). Although the comparables presented by the parties disclosed that the properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence.

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

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

APPELLANT

Susan McMahon, by attorney:
Michael R. O'Malley
Schmidt Salzman & Moran, Ltd.
111 West Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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