



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

APPELLANT: The 4856-60 W. Warner Ave. Condo Assn.  
DOCKET NO.: 18-32284.001-R-1 through 18-32284.016-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are The 4856-60 W. Warner Ave. Condo Assn., the appellant(s), by attorney Ciarra Schmidt, 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:

<b>DOCKET NO</b>	<b>PARCEL NUMBER</b>	<b>LAND</b>	<b>IMPRVMT</b>	<b>TOTAL</b>
18-32284.001-R-1	13-16-421-052-1001	567	7,121	\$7,688
18-32284.002-R-1	13-16-421-052-1002	672	8,436	\$9,108
18-32284.003-R-1	13-16-421-052-1003	567	7,125	\$7,692
18-32284.004-R-1	13-16-421-052-1004	672	8,436	\$9,108
18-32284.005-R-1	13-16-421-052-1005	567	7,125	\$7,692
18-32284.006-R-1	13-16-421-052-1006	672	8,436	\$9,108
18-32284.007-R-1	13-16-421-052-1007	567	7,125	\$7,692
18-32284.008-R-1	13-16-421-052-1008	602	7,556	\$8,158
18-32284.009-R-1	13-16-421-052-1009	524	6,580	\$7,104
18-32284.010-R-1	13-16-421-052-1010	602	7,556	\$8,158
18-32284.011-R-1	13-16-421-052-1011	524	6,580	\$7,104
18-32284.012-R-1	13-16-421-052-1012	602	7,556	\$8,158
18-32284.013-R-1	13-16-421-052-1013	524	6,580	\$7,104
18-32284.014-R-1	13-16-421-052-1014	633	7,944	\$8,577
18-32284.015-R-1	13-16-421-052-1015	633	7,944	\$8,577
18-32284.016-R-1	13-16-421-052-1016	633	7,944	\$8,577

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 2018 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 16 condominium units within a 90-year-old, multi-story, 16-unit condominium building. The property is located in Chicago, Jefferson Township, Cook County and 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 the overvaluation argument, the appellant submitted evidence of the sale of one unit located within the subject's building. This unit sold in 2015 for \$46,000. The appellant argues that the sale price should be reduced by 5% to account for personal property for an adjusted value of \$43,700. The appellant then applies the percentage of ownership of the unit sold of 6.618% to arrive at a value for the building of \$660,320. The appellant included a 2017 sales ratio document.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's assessment of \$129,605. The subject's assessment reflects a market value for all the appealed units of \$1,296,050 when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted the sales of two units in 2015 located within the subject building for a total value of \$198,500. The board of review then applies the percentage of ownership of the units sold of 12.913% to arrive at a value for the building of \$1,537,348. The board of review included the one sale that the appellant submitted.

### **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 best evidence of market value to be the sales submitted by the appellant and the board of review for a total price of \$198,500. However, the Board gives no weight to the appellant's adjustment for personal property as there is no evidence of this in the record. In applying the percentage of ownership of the unit sold of 12.913% arrives at a value for the building of \$1,537,348. The Board further finds the appellant submitted incorrect and unsupported median level of assessment evidence and gives this evidence no weight. In applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%, the Board finds the appellant failed to show by a preponderance of the evidence that the subject property was overvalued, and a reduction is not justified.

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:

May 17, 2022



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

AGENCY

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

APPELLANT

The 4856-60 W. Warner Ave. Condo Assn., by attorney:  
Ciarra Schmidt  
Schmidt Salzman & Moran, Ltd.  
111 West Washington Street  
Suite 1300  
Chicago, IL 60602

COUNTY

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