



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

APPELLANT: 87 E. Elm Condo Assn.  
DOCKET NO.: 18-43034.001-R-2 through 18-43034.004-R-2  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 87 E. Elm 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 **A Reduction** 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>
18-43034.001-R-2	17-03-201-077-1001	5,833	6,683	\$ 12,516
18-43034.002-R-2	17-03-201-077-1002	11,666	13,363	\$ 25,029
18-43034.003-R-2	17-03-201-077-1003	9,722	11,137	\$ 20,859
18-43034.004-R-2	17-03-201-077-1004	11,277	12,919	\$ 24,196

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) after receiving a decision from the Cook County Board of Review. The instant appeal challenges the assessment for tax year 2018. The Property Tax Appeal Board (the "Board") finds that it has jurisdiction over the parties and the subject matter of this appeal.

**Findings of Fact**

The subject consists of four condominium units. The total ownership interest in the common elements for the subject units was not disclosed. The subject unit with the PIN ending in -1001 has one bedroom, while the remaining subject units have two bedrooms. The property is located in North Chicago Township, Cook County. The subject units are all classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance (the "Classification Ordinance").

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on five sale comparables for the subject unit with the PIN ending in -1001. These sale comparables sold between February 2017 and December 2018 for

\$120,000 to \$138,000. None of these sale comparables were located within the subject's building. The appellant also submitted information on four sale comparables for the remaining three subject units. These sale comparables sold between October 2016 and February 2018 for \$217,500 to \$237,000. None of these sale comparables were located within the subject's building. In Section II of the appeal form, the appellant stated that the subject units are not owner-occupied. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$82,600.

The board of review submitted its "Board of Review Notes on Appeal" disclosing that the total assessment for the subject is \$201,250. The subject units have assessments that reflect the following market values when applying the 2018 statutory lev of assessment for class 2 property under the Classification Ordinance of 10.00%: -1001, \$304,930; -1002, \$609,830; -1003, \$508,220; and -1004, \$589,520.

In support of its contention of the correct assessment the board of review submitted cursory information on four equity comparables.

### **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 did meet this burden of proof and a reduction in the subject's assessment is warranted.

"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).

The Board finds the best evidence of market value for the subject unit with the PIN ending in -1001 to be appellant sale comparables #1, #2, and #3.<sup>1</sup> These sale comparables sold for prices ranging from \$120,000 to \$136,000. This unit's assessment reflects a market value of \$304,930, which is above the range established by the best comparables in this record.

The Board finds the best evidence of market value for the remaining three subject units to be appellant sale comparables #3 and #4.<sup>2</sup> These sale comparables sold for prices ranging from \$230,000 to \$237,000. The remaining subject units have assessments reflecting market values of \$609,830 for the unit with the PIN ending in -1002, \$508,220 for the unit with the PIN ending in -1003, and \$589,520 for the unit with the PIN ending in -1004, which are all above the range established by the best comparables in this record. Based on this record, the Board finds the

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<sup>1</sup> These comparables have the following PINs: #1 – 17-03-102-034-1005; #2 – 17-03-202-072-1002; and #3 – 17-03-222-025-1131.

<sup>2</sup> These comparables have the following PINs: #3 – 17-03-227-024-1009; and #4 – 17-04-224-043-1030.

appellant has proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject's assessment is 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.

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Chairman



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Member



\_\_\_\_\_  
Member



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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: July 19, 2022



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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

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