FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Charles E Snellgrove III Trust Agreement 9-29-19
DOCKET NO.: 20-47438.001-R-1
PARCEL NO.: 17-03-207-068-1108

The parties of record before the Property Tax Appeal Board are Charles E Snellgrove III Trust Agreement 9-29-19, the appellant(s), by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; 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:

LAND:	$1,700
IMPR.:	$70,300
TOTAL:	$72,000

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 2020 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 a residential condominium unit located on the 41st floor of a high-rise building of masonry construction known as the One Magnificent Mile Condominium, which contains 181 units and was constructed in 1984. The unit contains approximately 2,395 square feet of living area[1] and includes three bedrooms, three and one-half bathrooms, and central air conditioning. The subject has an undivided ownership interest in the condominium's common elements, although the specific percentage of ownership is not provided in the appraisal. The property is in the City of Chicago within North Chicago Township, Cook County. The subject is

[1] The appellant's brief states that the subject contains 2,430 square feet of living area, whereas the appraiser identifies the gross living area as 2,395 square feet. When such discrepancies arose, the Board gave greater weight to the appraiser's description, as it was based on a direct physical inspection of the property.

classified as a Class 2-99 property under the Cook County Real Property Assessment Classification Ordinance. The appellant reports that the subject unit is owner-occupied.

The appellant asserts overvaluation as the basis of the appeal. In support of this position, the appellant reported a recent purchase of the subject property and submitted a professional appraisal.

Regarding the sale, the appellant completed Section IV – Recent Sale Data of the appeal petition, stating that the subject unit was purchased on August 4, 2020, for $720,000. The petition identifies the seller as the trustee of the George Desanti Living Trust and affirms that the parties to the transaction were not related. The appellant further reported that the property was marketed through a realtor and was listed on the Multiple Listing Service (MLS) for approximately eight and one-half months. The petition also indicates that the sale was neither the result of a foreclosure nor conducted through a contract for deed.

To further establish the arm's length nature of the transaction, the appellant submitted a copy of the Settlement Statement, which confirms both the sale date and the purchase price. The Settlement Statement also reflects commission payments made to two real estate brokerage entities, consistent with a customary, open-market transaction.

For the overvaluation basis of this appeal the appellant contends also relies on a retrospective Uniform Residential Appraisal Report prepared by Michael J. Flynn, a Certified Residential Real Estate Appraiser. Flynn personally inspected the subject property on June 26, 2020, performing both interior and exterior inspections. The appraisal identifies its intended use as assisting the lender in evaluating the property for a mortgage finance transaction. It further states that the assignment was ordered by National Link, acting as the appraisal management company, on behalf of PNC Mortgage, and that these parties are the intended users of the report.

The appraisal concerns the residential condominium unit identified as PIN 17-03-207-068-1108. The appraiser documented the unit's physical characteristics, including 2,395 square feet of living area, three bedrooms, three-and-one-half bathrooms, and its location within a high-rise building. Market conditions, project characteristics, and interior features were addressed throughout the report and supplemental addenda.

In developing his value conclusion, Flynn relied exclusively on the sales comparison approach. He selected three comparable condominium sales located near the subject. These comparables ranged in size from 1,800 to 2,430 square feet and varied in bedroom counts, bathroom configurations, and conditions. Their unadjusted sale prices ranged from $650,000 to $870,000, with corresponding price-per-square-foot figures from roughly $300.63 to $443.55. Adjustments were made for differences in gross living area, condition, bathroom count, and amenities. After adjustments, the comparables supported values of $715,100, $720,000, and $693,100.

The appraisal also contains a discussion acknowledging the COVID-19 pandemic and national emergency declarations. Flynn notes that COVID-19 may influence real estate markets; however, he states that *any such impact was not measurable* as of the appraisal's effective date. He explains that insufficient market data existed to quantify COVID-related effects and therefore makes no COVID-19-based adjustment to the value. He cautions that future market conditions could change but affirms that the appraisal's conclusions apply solely as of June 26, 2020.

Based on the comparable sales analysis and the subject's contemporaneous contract price, Flynn concluded a final market value of $720,000 as of June 26, 2020.

The appellant additionally asserted a "contention of law," arguing that Cook County adopted a uniform policy during tax year 2020 to apply negative COVID-19 adjustments to the January 2020 market values of all Class 2 residential properties. In support of this position, the appellant submitted multiple written exhibits originating from the Cook County Assessor's Office, including published reports describing uniform COVID-19 value reductions, a COVID-19 FAQ stating that all residential properties would receive adjustments, a supplemental report confirming that the same methodology applied in the north suburbs and Chicago, and an example of a 2020 assessment in which the Assessor first established a pre-COVID market value using a recent sale and then applied a neighborhood-specific COVID-19 reduction. The appellant also submitted a legal brief asserting that the ongoing COVID-19 pandemic negatively affected the residential real estate market and that uniformity principles require applying the County's COVID-19 adjustment to the subject once its pre-COVID market value is established. Based on this evidence and legal argument, the appellant requested a reduction in the subject's total assessment to $66,355.

The Board of Review submitted its "Board of Review Notes on Appeal," reporting a total 2020 assessed value for the subject condominium unit of $94,941, consisting of $1,700 in land and $93,241 in improvement assessment.

In support of the correctness of this assessment, the Board provided a document titled "Condominium Analysis Results for 2020," which analyzes 29 sales occurring between 2017 and 2020 within the same 181-unit condominium building, including the subject's 2020 sale for $720,000. The analysis reflects total consideration from the 29 sales of $28,308,500, representing 15.9043% of ownership interests conveyed, and calculates a full building market value of $177,992,744. Applying the subject unit's ownership percentage of 0.5971% results in an indicated market value of $1,062,795, which corresponds to an assessed value of $106,279 under the Class 2-99 assessment level. The Board of Review therefore requested confirmation of the existing assessment.

In rebuttal, the appellant argues that the Board of Review effectively conceded both the taxpayer's COVID-19 legal contention and the underlying factual basis supporting it. The appellant asserts that the County maintained a uniform policy of applying negative COVID-19 adjustments to January 2020 residential values across all townships and neighborhoods, and notes that the Board submitted no evidence disputing this policy or its uniform application. The appellant also contends that the subject's recent arm's-length purchase is the best evidence of its fair cash value, supporting this position with documentation demonstrating MLS exposure, broker listing, absence of prior relationship between the parties, and non-assumption of the seller's mortgage. The appellant further states that the Board did not present any evidence challenging the arm's-length nature of the sale or showing that the sale price was not reflective of market value. Finally, the appellant argues that the Board's sales evidence consists of unadjusted comparables that PTAB precedent deems non-credible and entitled to no weight. Based on these arguments, the appellant requests that PTAB grant the relief sought.

Conclusion of Law

As a preliminary matter, the appellant requests COVID-19-based relief. Under 5 ILCS 100/10-15, the appellant bears the burden of proving its claim by a preponderance of the evidence. The Board finds this burden was not met.

The appellant submitted an appraisal and evidence of the subject property's recent sale, both of which determined a final market value for the lien year of $720,000 and requested a reduction in the assessment based on that amount. The appellant then sought an additional reduction from that value, asserting that COVID-19 had further affected overall real estate market conditions. The Board distinguishes between requests based solely on the existence of the pandemic and those supported by evidence demonstrating that COVID-19 directly influenced market conditions or the income-producing capacity of the subject property. Only the latter qualifies for consideration and must be supported by substantive proof that the subject's value was actually impacted.

The Board has carefully reviewed the appellant's contention that the subject's assessment should be reduced because, according to the appellant, Cook County uniformly applied negative COVID-19 adjustments to all residential properties for tax year 2020. The documents offered by the appellant, consisting of publications from the Cook County Assessor's Office, describe the Assessor's analytical methods for evaluating COVID-19's potential impact on residential property values. These publications discuss unemployment data, neighborhood-level indicators, and examples illustrating how certain pre-COVID values were modified to produce adjusted 2020 market values. However, the Board finds that these materials do not establish that the Assessor implemented a blanket, automatic, or universal downward adjustment applicable to every Class 2 residential property in Cook County. Rather, the materials demonstrate that the Assessor undertook an evaluative process aimed at determining whether adjustments were justified in particular neighborhoods or property types based upon available market evidence. The appellant did not present evidence showing that the Assessor applied COVID-19 adjustments to all comparable condominium units, nor did the appellant show that the Assessor failed to examine the potential impact of the pandemic on the subject itself.

The appellant's burden of proof does not disappear even if the Board offers nothing. In Illinois PTAB proceedings, the appellant always bears the burden to prove both the factual basis for the requested reduction and the legal entitlement to it. The appellant asserts that, because the Board of Review submitted nothing to dispute the taxpayer's legal contention and its underlying evidence, the Board therefore concedes both. However, the Board's silence cannot be construed as agreement or concession; PTAB does not treat the absence of a response as acceptance of the appellant's legal theory. Thus, the Board's lack of a contrary legal argument does not relieve the appellant of its obligation to present competent evidence demonstrating that a COVID-19 adjustment is required.

The Board further finds that the appellant's own valuation evidence contradicts the argument that a COVID-19 reduction is required. The Appraisal Report submitted by the appellant explicitly recognizes the COVID-19 pandemic and accompanying federal and state emergency declarations. Nevertheless, the appraiser states that any COVID-19 related market influence was "not measurable" as of the June 26, 2020, effective date of the appraisal due to insufficient market data. As a result, the appraiser applied no COVID-19-based adjustment to the concluded value. Thus, the appellant's own appraisal evidence affirms that no measurable COVID-19 impact existed at the relevant time and provides no basis for a COVID-related diminution in the subject's value.

Based solely on the record created by the appellant, the Board finds that the appellant has failed to demonstrate that the subject's market value was directly affected by the COVID-19 pandemic. The appellant presented no market data, sales evidence, or valuation analysis showing that COVID-19 directly reduced the subject's market value. Instead, it relied on generalized Assessor publications that do not establish the applicability of any COVID-19 adjustment to this property. In the absence of evidence demonstrating a measurable COVID-related effect on the subject—and in light of the appellant's own appraisal affirming that no such impact was identifiable—the Board concludes that the appellant failed to show entitlement to a COVID-19 adjustment or that the Assessor's treatment of the subject was non-uniform.

The appellant contends that the assessed valuation of the subject property does not accurately reflect its market value. When market value is at issue, the appellant must prove value by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e). Acceptable proof includes an appraisal, a recent sale of the subject property, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c). The Board finds that the appellant met this burden and that a reduction is warranted.

The Board assigns limited weight to the appraisal because it was prepared solely for mortgage-underwriting purposes and does not identify the Property Tax Appeal Board as an intended user. Although section 1910.65(c) requires that an appraisal be prepared by a licensed appraiser and comply with USPAP, it does not require that the report be developed specifically for ad valorem assessment review. Even so, PTAB has consistently recognized that appraisals produced for lending-related risk analysis may not fully reflect the standards and objectives applicable to determining fair cash value for property tax purposes. For this reason, the Board affords the appraisal limited evidentiary weight.

The Board finds that the appellant has provided more persuasive and probative evidence of market value through the recent, well-documented arm's-length sale of the subject property. PTAB precedent establishes that when a taxpayer submits evidence of a recent arm's-length sale and the Board of Review does not dispute the arm's-length nature of that transaction, the sale price is generally considered the most reliable indicator of fair cash value. In this matter, the Board of Review offered no evidence contradicting the validity of the sale.

Although the appraisal is given limited weight, the Board notes that its final value conclusion is consistent with the sale price and supports the appellant's position. Because the recent sale is credible, arm's-length, and unrebutted, the Board determines that the sale price provides the best measure of the subject property's fair cash value and bases its reduction accordingly.

Finally, as explained in the Board's COVID-19 analysis, no COVID-19 reduction is warranted. The appellant failed to present persuasive evidence demonstrating that the pandemic directly affected the subject's market value. Accordingly, the reduction granted reflects only the subject's sale-based fair cash value.

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: September 15, 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 9-125 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

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