



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

APPELLANT: 1851 Whipple Condo Assn.
DOCKET NO.: 21-30378.001-R-1 through 21-30378.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 1851 Whipple Condo Assn., the appellant, by attorney Noah J. 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-30378.001-R-1	13-36-311-044-1001	3,057	26,603	\$29,660
21-30378.002-R-1	13-36-311-044-1002	3,223	28,310	\$31,533
21-30378.003-R-1	13-36-311-044-1003	3,407	29,985	\$33,392

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 2021 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 three units. The building is 103 years old, and it is located on a 3,800 square foot site in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant condominium association asserts overvaluation as the ground for the appeal. In support of this argument, the appellant submitted information on recent sales of two units in the subject building. The unit whose PIN ends in 1002 sold for \$310,000 on July 31, 2020. The unit whose PIN ends in 1003 sold for \$375,000 on April 29, 2021. The total consideration for these two sales was \$685,000, and they represented a 68.441% ownership interest in the subject. According to the appellant, this suggests a total value of \$1,000,862 for the subject less 10% to

account for the value of personal property, reducing the total value to \$900,731. Appellant then requests an 8.55% level of assessment instead of the 10% level provided in the Cook County Real Property Assessment Classification Ordinance. Appellant's brief asserts that the lower level of assessment is supported by an attached copy of a 2020 sales-ratio study, but no sales-ratio study was attached. Appellant argues that the appropriate assessed value with the lower level of assessment is \$77,012.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject as \$94,585. In support of its contention of the correct assessment, the board of review submitted its Condominium Analysis Results for 2021. This included information about the same two sales upon which the appellant relied. Based on that data, the full value of the three units was \$1,000,862, indicative of a total assessed value was \$100,086, which is greater than the actual assessed value of \$94,585.

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 two recent sales of building units relied on by both parties suggested a value of \$1,000,862 for the subject, according to the board of review, and an assessed value of \$100,086, which is higher than the actual assessed value. The appellant agrees with the board of review's analysis and calculations leading to the above amounts, but it argues that there should be a 10% reduction to account for the fact that the sales it relied upon involved personal property. The appellant, however, 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, appellant failed to show that there should be a 10% reduction for personal property. Nor did appellant present evidence showing that the level of assessment should be 8.55% instead of the 10% level provided in the Cook County Real Property Assessment Classification Ordinance. Appellant's brief stated that a copy of a 2020 sales-ratio study had been attached to the brief, but no such copy was attached. Therefore, the appellant's argument that amounts should be deducted from the \$1,000,862 figure to determine the subject's market value and assessed value is without merit. Appellant failed to show overvaluation by a preponderance of the evidence, so an assessment reduction of that basis is 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: _____

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: _____

September 16, 2025



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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APPELLANT

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