



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

APPELLANT: Team Schiller Condominium Association  
DOCKET NO.: 21-30434.001-R-2 through 21-30434.007-R-2  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Team Schiller Condominium Association, 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 **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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-30434.001-R-2	17-06-215-039-1001	4,533	29,131	\$33,664
21-30434.002-R-2	17-06-215-039-1002	5,668	36,426	\$42,094
21-30434.003-R-2	17-06-215-039-1003	4,820	30,979	\$35,799
21-30434.004-R-2	17-06-215-039-1004	4,820	30,979	\$35,799
21-30434.005-R-2	17-06-215-039-1005	4,820	30,979	\$35,799
21-30434.006-R-2	17-06-215-039-1006	4,820	30,979	\$35,799
21-30434.007-R-2	17-06-215-039-1007	7,371	47,367	\$54,738

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 consists of 7 residential condominium units, one of which (-1007) is a coach house. The condominium is approximately 17 years old. The condominium has a 10,500 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject residential units are classified as class 2-99 properties under the Cook County Real Property Assessment Classification Ordinance.

The appellant filed the appeal as a contention of law with a brief and recent sale argument, along with a landscape document, setting forth four sales of parcels located in the subject condominium which occurred between 2019 and 2021. Based on this record, for each sale along with ownership percentages of each sold unit, the appellant reported a combined ownership interest in the sales within the condominium of 58.46%. The properties reportedly sold from September 2019 to June 2021 for a reported aggregate sales price of \$1,600,000. Based on this analysis, the appellant opined the subject building has an estimated market value of \$2,736,914 ( $1,600,000 \div 58.46\%$ ). Next, in the landscape document, the appellant set forth a “less 10% personalty” adjustment. After this adjustment, the appellant concluded a market value for the parcels on appeal of \$2,463,223. Then, once the 10% level of assessment is applied, the subject parcels should have a combined total assessment of \$246,322. Based on the foregoing, the appellant requested reductions be issued for the parcels on appeal.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject parcels of \$422,050. The subject's assessment reflects a market value of \$4,22,050, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In response to the appeal, the board of review asserted “appellants sales not listed on open market.” Furthermore, only one sale of unit (parcel) -1001 was listed with a sales price of \$380,000. The parties agree this property sold in April 2021 for \$380,000 and has a 12.30% ownership interest in the condominium.<sup>1</sup>

As to parcel -1007, the coach house, the board of review depicted a series of six rental listings of this unit. Furthermore, the board of review stated this “is [a] separate improvement under condo dec[laration] 2000 sqft coach house. Appellant’s request places unit at 49,264 [assessment]. No appraisal or additional market evidence provided.” A rental listing for this unit through the Multiple Listing Service (MLS) in January 2022 depicts an asking monthly rental price of \$6,900 and an actual rental price of \$6,200 along with a series of ten interior photographs presumably of this coach house.

Based on the foregoing submission, the board of review requested confirmation of the subject’s assessment.

### **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 met this

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<sup>1</sup> Using this single sale to estimate the value of the condominium, the result would be \$3,089,431 or a resulting assessment for the entire condominium at the 10% level of \$308,943, or a substantial reduction in the total assessment of \$422,050. However, the board of review submission did not present the foregoing equation as part of its evidence or argument.

burden of proof and, in the absence of additional market value evidence from the board of review, a reduction in the subject's assessment is warranted.

The appellant submitted data on the sales of four parcels located in the subject condominium while the board of review asserted that only one of those four sales was listed on the market, with no additional sales data or other market value evidence provided, for the Board's consideration.

The Property Tax Appeal Board finds that the best and only sales in the record from within the subject's condominium building consist of four properties presented by the appellant which sold from September 2019 to June 2021. These sales reflect an aggregate sales price of \$1,600,000. These four sales depict an aggregate ownership interest of the properties that sold of 58.46% resulting in a full market value for the subject condominium of \$2,736,914.

Applying the ownership interest of the units on appeal of 100% to this full value of the building, results in a total assessment of \$273,691 for the parcels on appeal. The Board also finds that the appellant provided no evidence demonstrating that any amount of the purchase price of the four units included consideration for personal property or identified specifically those items considered personal property. Therefore, on this record, the Board has given no weight to the appellant's 10% downward adjustment to the sales prices for purported "personalty."

Given this record, the Board finds that the current total assessment of the seven residential units on appeal is \$422,050. While the board of review criticized the appellant's sales data, except for one unit, as not being market sales, the board of review also did not provide any other and/or alternative market value evidence in support of the subject's assessment. Thus, on this record, the Property Tax Appeal Board finds the only evidence of record concerning market value presented by the appellant establishes by a preponderance of the evidence that the subject condominium building is overvalued, and therefore reductions in the assessments of the seven units on appeal are 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: \_\_\_\_\_

June 17, 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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