



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

APPELLANT: 1625 N. Western CA  
DOCKET NO.: 21-34486.001-R-1 through 21-34486.011-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 1625 N. Western CA, the appellant, by attorney Timothy C. Jacobs, of Kovitz Shifrin Nesbit, 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
21-34486.001-R-1	14-31-326-076-1003	2,779	32,258	\$35,037
21-34486.002-R-1	14-31-326-076-1004	3,187	36,995	\$40,182
21-34486.003-R-1	14-31-326-076-1005	4,101	48,118	\$52,219
21-34486.004-R-1	14-31-326-076-1006	2,872	33,003	\$35,875
21-34486.005-R-1	14-31-326-076-1007	3,342	38,542	\$41,884
21-34486.006-R-1	14-31-326-076-1008	4,252	49,672	\$53,924
21-34486.007-R-1	14-31-326-076-1009	2,947	34,689	\$37,636
21-34486.008-R-1	14-31-326-076-1010	3,493	41,004	\$44,497
21-34486.009-R-1	14-31-326-076-1011	4,399	51,232	\$55,631
21-34486.010-R-1	14-31-326-076-1012	4,101	48,118	\$52,219
21-34486.011-R-1	14-31-326-076-1013	4,252	49,672	\$53,924

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 11 residential condominium units located in an approximately 28-unit condominium building<sup>1</sup> that is approximately 22 years old. The residential units on appeal have a combined 89.50% ownership interest in the condominium. The condominium has a 9,755 square foot site including 17 parking units, several commercial units 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, along with a landscape document, asserting the three sales consist of arm's length transactions of residences located in the subject building along with an associated parking unit. Based on this record, for each sale along with combined ownership percentages of each sold parcel, the appellant reported a combined ownership interest in the sales within the condominium of 29.53%.<sup>2</sup> The properties reportedly sold from August to December 2020 for a reported aggregate sales price of \$1,612,000. Based on this analysis, the appellant opined the subject building has an estimated market value of \$5,458,855 ( $1,612,000 \div 29.53\%$ ). When the aggregate ownership interest of the appealed parcels of 89.5% is applied to the total building value, the appellant concluded a market value for the parcels on appeal of \$4,885,675. Then, once the 10% level of assessment is applied, the subject parcels should have a combined total assessment of \$488,568, rounded.

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 \$522,750. The subject's assessment reflects a market value of \$5,227,500, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment, the board of review submitted a document entitled Condominium Analysis Results for 2021 prepared by Boetius Turek in which 9 sales of parcels in the condominium were outlined. The sales occurred from September 2020 to July 2021 with an aggregate sales price of \$2,119,469 and a combined ownership interest in the sold units of 37.71% resulting in a conclusion of the full value of the units sold of \$5,620,442. Next, the analysis contends that the ownership interest of the units on appeal is 89.5%. With this ownership percentage, the analysis finds the units on appeal have a total market value of \$5,030,295, and an assessment of \$503,030, rounded, when applying the Ordinance level of assessment for class 2-99 property of 10%, which is below the current assessment of the parcels on appeal.

Finally, as part of its submission, the board of review proposed a total assessment reduction for the parcels on appeal to \$503,030 but failed to provide a proposed breakdown of the suggested reduction(s).

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<sup>1</sup> Reportedly, several of the units not on appeal are commercial units along with 24 parking units which are also excluded in this appeal.

<sup>2</sup> Six parcel numbers are identified for the three residential unit sales along with a parking unit.

### **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 record evidence establishes that a reduction in the subject's assessment is warranted.

The appellant submitted data on the purported sales of six parcels located in the subject condominium while the board of review submitted data on the sales of nine parcels located in the subject condominium for the Board's consideration. As a preliminary matter and based upon the identified parcel numbers, the parties had six "overlapping" or common sales.

However, in this regard, the Board has given reduced weight to appellant's sales data which fails to accurately identify the entire sales prices and/or dates of sales which were reported by the board of review. In the absence of any rebuttal from the appellant to support the original sales data and dates of sale, the Board has accepted the data from the board of review which appears to be more comprehensive. Therefore, after thorough analysis of the sales data, the Board will utilize the sales data presented by the board of review consisting of nine sales.

The Property Tax Appeal Board finds that the best and most proximate sales in the record from within the subject's condominium building consist of nine properties which sold from September 2020 to July 2021. These sales reflect an aggregate sales price of \$2,119,469. These nine sales depict an aggregate ownership interest of the properties that sold of 37.71% resulting in a full market value for the subject condominium building of \$5,620,442.

Applying the ownership interest of the units on appeal of 89.5% to this full value of the building, results in a total value of \$5,030,295 or a total assessment of approximately \$503,030, rounded, for the parcels on appeal. In contrast, the Board finds that the current total assessment of the eleven residential units on appeal is \$522,750. Thus, on this record, the Property Tax Appeal Board finds the evidence of record establishes by a preponderance of the evidence that the subject condominium building is overvalued, and therefore reductions in the assessments of the 11-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: \_\_\_\_\_

May 20, 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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