



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

APPELLANT: Susan Stec
DOCKET NO.: 21-34810.001-R-1
PARCEL NO.: 17-05-325-058-1003

The parties of record before the Property Tax Appeal Board are Susan Stec, the appellant(s), by attorney Jennifer Kanik, of the Law Offices of Terrence Kennedy Jr. 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:

LAND: \$2,257
IMPR.: \$52,159
TOTAL: \$54,416

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

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 consists of a single condominium unit with a 21.74% ownership interest in the common elements of a four-unit condominium building located in Chicago, West Chicago Township, Cook County. The subject property is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant's appeal is based on overvaluation. In support of this argument, appellant submitted a brief disclosing sales information for all four units in the subject's building. The four units sold between September 2012 and September 2022 for prices ranging from \$356,000 to \$650,000. Appellant's brief lists the sale in 2022 for one condominium unit that sold for \$504,000. In its analysis, appellant deducted 5% for personal property. Based on this evidence, appellant requests the assessment of all the units be reduced by 12.47% or, alternatively, the subject unit be assessed at \$46,532. Appellant listed various current assessment values for the subject as well

as requested assessment values throughout appellant's brief with no clear indication of what appellant is requesting. In addition, appellant submitted a copy of the board of review's decision reflecting the subject property was assessed at \$55,273.

In support of its contention of the correct assessment, the board of review submitted its "Board of Review – Notes on Appeal" disclosing the subject property's total assessment of \$55,273. This assessment reflects a market value of \$552,730 using the Cook County Real Property Assessment Classification Ordinance for class 2 property of 10%. In its attached evidence, the board of review submits its assessment analysis using the sale of one condominium unit in the same building as the subject property¹. The one sale comparable sold for \$600,000. After applying the percentage ownership interest in the common elements of the one comparable sale of 21.74%, the board of review calculated a total market value of the subject unit's building as \$2,759,889.

This matter was set to proceed to hearing. Prior to hearing, the parties submitted a written request to waive hearing and for this matter be written on the evidence previously submitted. The administrative law judge granted the parties' request.

Conclusion of Law

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

The Board gives no weight to appellant's analysis deducting 5% for personal property. Appellant did not submit evidence in the form a legal brief nor submit other evidence sufficient for the Board to consider a reduction for personal property.

The Board finds the best evidence of market value to be the board of review's one comparable sale and appellant's one comparable sale used in its analysis. These units sold for a total of \$1,104,000. The percentage ownership of the units sold of 44.11% divided by the total sale price results in a value for the building of \$2,502,834. Multiplying this value by the percentage ownership of the unit under appeal arrives at a market value for the subject at \$544,116. Based on this record, the Board finds that the subject property's current assessment of \$55,273 reflects a market value that is not supported by the current assessment. Accordingly, appellant did prove by a preponderance of the evidence that the subject property was overvalued and a reduction in the subject's assessment is justified.

¹ This sale comparable was also submitted by appellant in her evidence.

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: _____

November 25, 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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