



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

APPELLANT: The Buckingham Place Condo Assoc.  
DOCKET NO.: 21-36472.001-R-1 through 21-36472.003-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are The Buckingham Place Condo Assoc., the appellant(s), by attorney Alan D. Skidelsky, of Skidelsky & Associates, P.C. 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:

<b>DOCKET NO</b>	<b>PARCEL NUMBER</b>	<b>LAND</b>	<b>IMPRVMT</b>	<b>TOTAL</b>
21-36472.001-R-1	14-21-308-067-1001	18,953	35,513	\$54,466
21-36472.002-R-1	14-21-308-067-1002	14,963	28,036	\$42,999
21-36472.003-R-1	14-21-308-067-1003	15,960	29,906	\$45,866

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 consists of an approximately 115-year-old, three-story, three-unit residential condominium building. It is situated on a parcel of land containing approximately 3,325 square feet, located in the City of Chicago, within Lake View Township, Cook County, Illinois. The property is classified as Class 2-99 under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts that the subject property is overvalued. In support of this claim, the appellant submitted an appraisal estimating the property's market value at \$307,000 as of October 27, 2020. The appraisal was prepared by William Grba, a Certified Residential Real Estate Appraiser, who expressly indicated that the report was intended solely for use by the

lender/client and their assignees in connection with a commercial mortgage financing transaction. The appraisal was not prepared for ad valorem purposes, and neither the Property Tax Appeal Board nor the Board of Review is identified as an intended user of the report. In developing his opinion of value, the appraiser relied upon the sales comparison approach.

Under the sales comparison approach, the appraiser analyzed five comparable properties to estimate the subject's market value. The comparable properties are located between 0.07 and 0.18 miles from the subject. Parcel site sizes for the comparable properties were not provided. Each comparable is improved with a two-story dwelling ranging from 3 to 23 years of age. The dwellings contain between 900 and 1,214 square feet of living area, with varying degrees of similarity to the subject. Comparable sales Nos. 1 through 3 sold in 2020, while comparable properties Nos. 4 and 5 were reported as active listings. Comparable sales Nos. 1 through 3 sold for prices ranging from \$290,000 to \$365,000, including land.

In the market value analysis, the appraiser adjusted the comparable properties for differences in location, living area, bedroom count, bathroom count, basement finish, and other relevant features. Based on this analysis, the appraiser concluded that the subject property had an estimated market value of \$307,000 as of October 27, 2020. Relying on this evidence, the appellant requested that the total market value of the subject units be reduced to a level consistent with the appraiser's reported value.

The Board of Review submitted its "Board of Review Notes on Appeal," disclosing a total assessment of \$143,333 for the subject condominium unit. This assessment reflects an implied market value of \$1,433,330, based on the 10% level of assessment applicable to Class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its position that the assessment is correct, the Board of Review submitted a document titled "Condominium Analysis Results for 2021," prepared by Marcos Fernandez. The analysis relied upon the reported sale of one of the subject condominium units, identified by its parcel identification number, which sold in 2021. The Board of Review argued that several recent sales support a higher market value for the subject property. The Board of Review also provided limited information regarding four additional comparable sales that occurred in 2021.

Based on this evidence, the Board of Review requested that the subject's assessment be confirmed.

This matter was scheduled to proceed to hearing. Prior to the hearing, the parties submitted a written request to waive the hearing and have the matter decided based on the evidence previously submitted. The administrative law judge granted the parties' request.

### **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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

In determining the fair market value of the subject property, the Board assigns no weight to the appraiser's final value conclusion, as the Property Tax Appeal Board was not identified as an intended user of the appraisal. Identification of PTAB as an intended user is essential because an appraisal used in a property tax appeal must be prepared specifically for ad valorem purposes and must address the valuation standards, legal requirements, and evidentiary needs of this tribunal. When PTAB is not listed as an intended user, the appraisal is not developed with the appropriate scope of work or assumptions necessary for property tax valuation, and the Board cannot rely upon its conclusions. Additionally, the appraiser relied upon two properties that were merely active listings rather than closed sales, which further diminishes the reliability of the valuation.

The Board, however, may consider the three actual closed sales included within the appraisal report, independent of the appraiser's conclusion, as well as the four comparable sales submitted by the Board of Review. The Board notes that both parties provided very limited information relating to their respective comparable properties. Notably, the appraiser did not report parcel site sizes, lot square footage, or the Property Index Numbers for the comparable properties. The absence of Property Index Numbers is significant, as these identifiers provide critical information regarding parcel boundaries, subdivision and block location, legal description, and township and tax district classification—each of which is necessary to evaluate whether the comparable properties are suitably similar to the subject property. Without this information, the appellant has limited the Board's ability to perform a complete and reliable comparison.

Ultimately, the appellant bears the burden of proving by a preponderance of the evidence that the subject property is overvalued. The burden of proof is a meaningful and essential standard in property tax appeals, requiring the appellant to present sufficiently complete, credible, and persuasive evidence to demonstrate that the assessed value exceeds the property's fair market value. In this case, the appellant failed to meet that burden. The record does not contain adequate or reliable evidence upon which the Board could establish an alternative market value for the subject property for the lien year at issue.

Based on the evidence presented, the Board finds that a reduction in the subject's assessment 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

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 16, 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

AGENCY

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