



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

APPELLANT: Andersonville Manor Condominium Assoc.
DOCKET NO.: 21-36620.001-R-1 through 21-36620.008-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Andersonville Manor Condominium Assoc., the appellant, by Noah J. Schmidt, attorney-at-law 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
21-36620.001-R-1	14-08-116-046-1001	7,316	35,683	\$42,999
21-36620.002-R-1	14-08-116-046-1002	7,496	36,502	\$43,998
21-36620.003-R-1	14-08-116-046-1003	7,770	38,228	\$45,998
21-36620.004-R-1	14-08-116-046-1004	8,925	44,074	\$52,999
21-36620.005-R-1	14-08-116-046-1005	9,158	44,841	\$53,999
21-36620.006-R-1	14-08-116-046-1006	9,618	47,381	\$56,999
21-36620.007-R-1	14-08-116-046-1007	3,381	16,618	\$19,999
21-36620.008-R-1	14-08-116-046-1008	4,628	22,371	\$26,999

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 eight-unit residential condominium situated on a site with 7,287 square feet of land area. The condominium was built in 1922 and is approximately 99 years old. The property is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-99 residential condominium property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends the subject property is overvalued based on the sale of one of the residential condominium units within the subject's condominium. The appellant disclosed a residential condominium unit within the building identified by parcel number (PIN) 14-08-116-046-1004 with a 15.31% ownership interest in the condominium sold in July 2019 for a price of \$595,000. To document the sale the appellant submitted a copy of the listing and an unofficial copy of the warranty deed. The appellant divided the sales price by the unit's percentage of ownership interest in the condominium to arrive at a total aggregate price for the condominium of \$3,886,349. The appellant then deducted 10% of the aggregate price or \$388,634 for personalty to arrive at an aggregate value for the condominium of \$3,497,715. Applying a 9.09% level of assessment to the aggregate value resulted in a total aggregate assessment for the subject property of \$317,942. Based on this evidence the appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total combined assessment for the subject property of \$343,990. The subject's assessment reflects a market value of \$3,439,900, when using the Cook County Real Property Assessment Classification Ordinance level of assessments for class 2-99 property of 10%.

In support of its contention of the correct assessment the board of review submitted a document titled Condominium Analysis Results for 2021 for the subject's condominium complex prepared by Ashton Language. The analysis listed the PIN for each condominium unit and their respective percentages of ownership interest in the condominium. The condominium analysis included the same sale of a residential condominium unit located in the subject property as used by the appellant. The analysis indicated that PIN 14-08-116-046-1004, with a 15.31% ownership interest in the condominium, sold in July 2019 for a price of \$595,000. The board of review indicated the total adjusted consideration for the unit was \$595,000. The board of review indicated that dividing the total adjusted consideration by the percentage of interest of the unit that sold resulted in an estimated market value for the subject's condominium complex of \$3,886,348.¹ Multiplying the estimated market value of the complex by the level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance of 10% resulted in a total aggregate assessment for the subject property of \$388,635, which is greater than the subject's total combined assessment of \$343,990.

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.

Both parties used the sale of the same residential condominium unit in the subject property that sold in July 2019 for a price of \$595,000 to support their respective positions. The parties agreed this unit had a 15.31% ownership interest in the condominium and dividing the purchase price by

¹ Rounding the quotient results in a total value of \$3,886,349.

the percentage of ownership of the unit that sold results in a total value for the condominium of \$3,886,349. The Board gives less weight to the appellant's analysis which deducted 10% from the estimated total value for personal property as there is no evidence in the record to support the deduction. Additionally, the Board finds the appellant debased the estimated market value by a 9.09% level of assessment, however, there is no evidence in the record to support the use of this level of assessment rather than the use of the Cook County Real Property Assessment Classification Ordinance level of assessments for class 2-99 property of 10%. The Board finds the better analysis was presented by the board of review which results in an estimated total value for the subject condominium of \$3,886,349 and an aggregate total assessment of \$388,635, which is greater than the subject's total combined assessment of \$343,990. Based on this record the Board finds the assessment of the subject property is correct and a reduction is not appropriate.

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: March 18, 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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