



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

APPELLANT: 853 W. Wrightwood Condominium Assn.
DOCKET NO.: 21-36626.001-R-1 through 21-36626.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 853 W. Wrightwood Condominium Assn., the appellant(s), 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 **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
21-36626.001-R-1	14-29-416-088-1001	16,031	49,968	\$65,999
21-36626.002-R-1	14-29-416-088-1002	12,891	40,108	\$52,999
21-36626.003-R-1	14-29-416-088-1003	17,953	56,046	\$73,999

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 one two-bedroom and two three-bedroom condominium units within a condominium building. The property is located in Chicago, Lake View Township, Cook County and is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and inequity as the bases of appeal. In support of these arguments, the appellant submitted five two-bedroom comparables and five three-bedroom comparables located near the subject. The two-bedroom condominium units sold from July 2020 to January 2022 for prices ranging from \$215,000 to \$238,000 or from \$107,500 to \$119,250 per bedroom. The three-bedroom condominium units sold from February 2021 to May 2022 for

prices ranging from \$369,000 to \$420,000 or from \$123,000 to \$140,000 per bedroom. The units had assessments from \$11,698 to \$45,000. The appellant submitted the board of review level appeal decision which discloses an assessment for each unit for a total assessment of \$192,997.

The appellant also included the assessor's website printouts for five properties classified as 2-06, *Two-or-more story residence, over 62 years of age, 2,201 to 4,999 square feet*.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's assessment of \$192,997. The subject's assessment reflects a market value of \$1,929,970 when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The units have individual assessments of \$65,999, \$52,999, and \$73,999 which reflect market values of \$659,990, \$529,990, and \$739,990.

In support of its contention of the correct assessment the board of review submitted a document asserting that the appellant's unadjusted comparables failed to account for age, location, condition, quality, POI and amenities. In addition, the board of review argues the appellant did not submit any characteristics of the comparables to support the appellant's claims. The board of review listed the bedrooms and baths for each subject unit.

In addition, the board of review submitted the multiple listing sheets (MLS) disclosing the sales for each of the subject units. The subject units sold from July 2008 to November 2017 for prices ranging from \$405,000 to \$615,000. The board of review also submitted three two-bedroom comparables and four three-bedroom comparables located near the subject. The two-bedroom condominium units sold from April 2021 to May 2022 for prices ranging from \$534,000 to \$645,000 or from \$267,000 to \$322,500 per bedroom. The three-bedroom condominium units sold from January 2021 to May 2022 for prices ranging from \$640,000 to \$795,000 or from \$213,333 to \$265,000 per bedroom.

Conclusion of Law

The taxpayer contends overvaluation as the basis of the appeal. 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 gives no weight to the appellant's evidence that consists of class 2-06 comparables. These printouts address single-family homes and are not comparable to the subject which are condominium units within a condominium building.

The Board finds the best evidence of market value to be all the sale comparables submitted by both parties. The two-bedroom comparables sold from July 2020 to May 2022 for prices ranging from \$215,000 to \$645,000 or from \$107,500 to \$322,500 per bedroom. In comparison, the subject unit with two bedrooms has an assessment which reflects a market value of \$529,990 or \$264,995 per bedroom which is within the range of the comparables. The three-bedroom comparables sold from January 2021 to May 2022 for prices ranging from \$369,000 to \$795,000 or from \$123,000 to \$265,000 per bedroom. In comparison, the two subject units with three

bedrooms have assessments which reflects a market value of \$659,990 or \$219,997 per bedroom and \$739,990 or \$246,663 per bedroom which are within the range of the comparables. Therefore, the Board finds the appellant has not proven by a preponderance of evidence that the subject was overvalued, and a reduction based on this is not warranted.

The taxpayer also contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b).

The Board finds that the appellant failed to submit sufficient evidence to determine if the subject property was over assessed. Although the comparables presented by the appellant are similar in location, the Board finds the appellant failed to submit a key element to comparability: the percentage of ownership allocated to each unit. Therefore, the Board finds the appellant did not demonstrate by clear and convincing evidence that the subject was inequitably assessed and a reduction 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



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: _____

February 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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