



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

APPELLANT: Atelier Condominium Association  
DOCKET NO.: 21-36851.001-R-1 through 21-36851.010-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Atelier Condominium Association, the appellant, 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
21-36851.001-R-1	14-21-101-033-1001	6,107	23,708	\$29,815
21-36851.002-R-1	14-21-101-033-1002	6,107	23,708	\$29,815
21-36851.003-R-1	14-21-101-033-1003	6,350	24,650	\$31,000
21-36851.004-R-1	14-21-101-033-1004	6,350	24,650	\$31,000
21-36851.005-R-1	14-21-101-033-1005	6,350	24,650	\$31,000
21-36851.006-R-1	14-21-101-033-1006	6,350	24,650	\$31,000
21-36851.007-R-1	14-21-101-033-1007	6,350	24,650	\$31,000
21-36851.008-R-1	14-21-101-033-1008	6,350	24,650	\$31,000
21-36851.009-R-1	14-21-101-033-1009	6,041	23,452	\$29,493
21-36851.010-R-1	14-21-101-033-1010	6,041	23,452	\$29,493

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 is improved with an approximately 129-year-old ten-unit condominium building. The property has a 7,800 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing one of the units was purchased on December 26, 2019 for a price of \$310,000. The appellant reported that the seller was Brynna Aylward, the parties to the transaction were not related, and the property sold through a realtor. The appellant also indicated the property was advertised for sale through the Multiple Listing Service for an undisclosed period of time. The appellant submitted a spreadsheet summarizing the sale and depicting the corresponding percentage of ownership of the units under appeal and the sale date along with a copy of a RealInfo Target Property printout confirming the sale date and sale price. The appellant allocated 10% of the gross consideration to account for an overall market adjustment, including personal property transferred with each unit. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$304,616. The subject's assessment reflects a market value of \$3,046,160 when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10%.

In support of its contention of the correct assessment the board of review submitted a document entitled Condominium Analysis Results for 2021 in which it used the same sale submitted by the appellant to estimate the value of the condominium under appeal. The board of review analysis indicated this unit had a 10.1766% ownership interest in the condominium. Dividing the total consideration by the percentage of ownership in the condominium resulted in a full value of the condominium building of \$3,046,204 which results in a total combined assessment for the ten units under appeal of \$304,620 when applying the 10% Ordinance level of assessment for class 2-99 property.

### **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.

The Board gives no weight to the appellant's adjusted sale price as there is no evidence in the record to support any adjustment to the sale price to account for personal property.

The Board finds the best evidence of market value to be the parties' common sale, which sold December 26, 2019 for a total consideration of \$310,000. The appellant disclosed the property was advertised for sale and had the elements of an arm's length transaction. This unit has an ownership interest of 10.1766%. Dividing the total consideration of this unit by its ownership interest yields a full value of the condominium building of \$3,046,204, which is greater than the subject's estimated market value as reflected by its assessment of \$3,046,160. Based on this record the Board finds a reduction in the subject's assessment is not justified.

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.

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Chairman



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Member



\_\_\_\_\_  
Member



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Member



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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



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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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APPELLANT

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COUNTY

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