



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

APPELLANT: 1717 W. Julian CA
DOCKET NO.: 21-37483.001-R-1 through 21-37483.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 1717 W. Julian CA, the appellant, by attorney Timothy C. Jacobs, of Kovitz Shifrin Nesbit 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:

| DOCKET NO | PARCEL NUMBER | LAND | IMPRVMT | TOTAL |
|------------------|----------------------|-------------|----------------|--------------|
| 21-37483.001-R-1 | 17-06-213-053-1001 | 4,080 | 40,920 | \$45,000 |
| 21-37483.002-R-1 | 17-06-213-053-1002 | 4,080 | 40,920 | \$45,000 |

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 consists of a 3-story 2-unit residential condominium building with 2 garage parking stalls. The two condominium units have a combined 100.00% ownership interest in the common elements. The units each consist of 3-bedrooms, 2½-bathrooms and have central air conditioning. The building was originally constructed in approximately 2002. The condominium property has 2,400 square feet of land area and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$900,000 as of January 1, 2021 for the two residential units. The appraisal was prepared by certified general real estate appraisers Thomas W. Grogan, MAI and John T. Setina, III for a real estate

assessment appeal. On page 14 of the appraisal, the appraisers assert the subject property was observed on October 11, 2021 and at that time the subject property was not listed for sale nor were the appraisers aware of any offers to purchase or lease for the subject property.

In estimating the market value of the subject property, the appraisers developed the sales comparison approach to value selecting five comparable sales of condominium units located “within blocks of the subject immediate area.” The comparables have sites that range in size from 5,005 to 14,715 square feet of land area. Each comparable has 3-bedrooms and either 2 or 2½-bathrooms. Each of the comparables sold with at least one parking space, where comparable #5 is an indoor garage space. The comparables sold from May 2019 to November 2021 for per unit prices ranging from \$435,000 to \$455,000.

The appraisers presented a qualitative adjustment grid for the comparables which reported adjustments for sale condition, economic trends, age, condition and bathroom count,¹ arriving at a per unit market value of \$450,000 and a combined total market value of \$900,000 for the subject property. Based on this evidence, the appellant requested the subject’s assessment be reduced to reflect the appraised value when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" for one of the subject’s two parcels. The appellant submitted a copy of the Cook County Board of Review’s final decision disclosing the combined total assessment for the subject two units of \$135,360. The subject's assessment reflects a market value of \$1,353,600, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a sales analysis prepared by Ashton Language, an analyst with the Cook County Board of Review. The analyst provided sales data on two comparable sales located in the subject’s condominium property. Both of the selected sales are reported to have occurred on January 1, 2021 each for a price of \$510,000 or a total consideration for the sales of \$1,020,000. The Notes on Appeal indicated the board was not willing to stipulate in this appeal. Although, without explanation, the “assessment after board of review action” reports a total assessment for one parcel of \$51,000.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

¹ The qualitative adjustments grid reports a superior adjustment for sale conditions associated with comparable #5, although the narrative explanation describes no adjustments for sale conditions were made.

The appellant submitted an appraisal and the board of review submitted a condominium analysis. The Board gives less weight to the condominium analysis submitted by the board of review which reported each of the subject parcels sold on January 1, 2021 for sale prices of \$510,000 in contrast to the appraisal which reported no recent sale transactions for the subject parcels.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant which presented five comparables that were adjusted for differences from the subject. The subject's assessment reflects a per unit market value of \$676,800 or a combined market value of \$1,353,600, including land, which falls above the appraised value. The Board finds the subject's two units had a market value of \$900,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2)).

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:

May 20, 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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