



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

APPELLANT: 2100 N. Damen Avenue Condominium Association
DOCKET NO.: 21-37487.001-R-1 through 21-37487.004-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 2100 N. Damen Avenue Condominium Association, the appellant, by attorney Timothy C. Jacobs, of Kovitz Shiffrin 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
21-37487.001-R-1	14-31-131-040-1002	1,777	17,239	\$19,016
21-37487.002-R-1	14-31-131-040-1003	1,977	19,178	\$21,155
21-37487.003-R-1	14-31-131-040-1004	2,743	26,524	\$29,267
21-37487.004-R-1	14-31-131-040-1005	3,042	29,520	\$32,562

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 four residential units located in a five-unit mixed use condominium association with a combined 87.2700% ownership interest in the common elements. The units consist of one 1-bedroom/1-bathroom, one 2-bedrooms/1-bathroom and two 2-bedrooms/2-bathrooms. The building was originally constructed in approximately 1891 that has been updated overtime. 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

\$1,020,000 as of January 1, 2021 for the four 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.

In estimating the market value of the subject property, the appraisers developed the sales comparison approach to value selecting 12 comparable sales of condominium units located on Chicago's west side like the subject. Comparables #1 through #4 have a 1-bedroom/1-bathroom layout and sold from July 2020 to May 2021 for unit prices ranging from \$180,000 to \$218,000, including land. Comparables #5 through #8 are 2-bedroom/1-bathroom units that sold from December 2020 to May 2021 for unit prices ranging from \$220,000 to \$255,000, including land. Comparables #9 through #12 have 2-bedrooms and either 1½ or 2-bathrooms that sold from December 2020 to June 2021 for unit prices ranging from \$275,000 to \$295,000, including land.

After adjusting the comparables, the appraisers reconciled market values of \$210,000 for the 1-bedroom/1-bath unit, \$240,000 for the 2-bedroom/1-bath unit and \$285,000 each for the two 2-bedroom/2-bathroom units and a combined total market value of \$1,020,000. 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" disclosing the combined total assessment for the subject's four units of \$111,725. The subject's assessment reflects a market value of \$1,117,250, 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 Lucas Schumann, an analyst with the Cook County Board of Review. The analyst provided sales data on two comparable sales of residential units in the subject's condominium property. The sales occurred in February 2016 and March 2017 for prices of \$228,500 and \$314,500 and a total consideration for these sales of \$543,000. The total consideration was divided by the percentage of interest of ownership in the condominium property for the units that sold of 45.9600% to arrive at an indicated full value for the property of \$1,181,462. The analyst then applied the percentage of interest of the units under appeal of 87.2700% to arrive at a full value for the four units under appeal of \$1,031,061 and total combined assessment for the four units of \$103,106, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence the board of review requested confirmation of the subject's assessment.

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.

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 is based on comparable sales from 2016 and 2017 less proximate to the assessment date at issue in this appeal than the comparable sales presented in the appraisal. The Board finds the best evidence of market value to be the appraisal submitted by the appellant which presented 12 comparables which sold more proximate to the assessment date and were adjusted for differences from the subject. The subject's assessment reflects a market value of \$1,117,250, including land, which falls above the appraised value.

The Board finds the four residential condominium units that are the subject of this appeal had a market value of \$1,020,000 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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