



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

APPELLANT: Lawrence Abrahams  
DOCKET NO.: 21-38379.001-R-1  
PARCEL NO.: 14-08-203-015-1317

The parties of record before the Property Tax Appeal Board are Lawrence Abrahams, the appellant(s); 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:

**LAND:** \$1,003  
**IMPR.:** \$15,077  
**TOTAL:** \$16,080

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 a single residential condominium unit with a 0.2127% ownership interest in the common elements with 815 square feet of living area. It is situated in a 466-unit, 46-year-old, 38-story building of masonry construction. The property has a 58,965 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 indicated that subject property is owner-occupied.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on two sales comparables, one comparable that was unsold but under contract and two "listed" unsold comparables located within the subject building or in an adjacent building. The two sales comparables sold between November and December for \$160,000 and \$175,000. The unsold comparables were priced between \$129,000 and \$155,000.

The appellant also contends assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on twelve suggested equity comparables. The appellant also submitted a document titled "narrative of evidence" which gave a procedural background of his appeal and provided a detailed analysis and argument supporting both his sales and equity comparables. Based on this evidence the appellant requested the subject's improvement assessment be reduced to \$12,750.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$17,199. The subject's assessment reflects a market value of \$171,990 or \$210.03 per square foot of living area, including land, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. The subject property has an improvement assessment of \$16,196 or \$19.87 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted a condominium analysis showing that 85 units in the subject's building or 17.7% of ownership in the common elements, sold between January 2018 and November 2021 for an aggregate price of \$15,081,906. The aggregate sale price was then divided by the percentage of ownership interest in the common elements of the units sold to arrive at a total market value for the building of \$84,837,524 multiplied by the percentage of ownership of the subject unit to arrive at a fair market value of \$180,449. In support of its contention of the correct assessment the board of review also submitted *limited* information on equity comparables located in the same complex as the subject.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted. (emphasis added)

The Board gives no weight to the submitted "listed" or under contract comparables. Proof of market value may be proven by comparable sales. The market value of the subject can only be determined by an analysis of the sale price of the submitted comparables. Appellant's comparables were merely "listed" or under contract and no sales information was provided by the appellant. The Board gives little weight the appellant's two sales comparables. Those sales comparables sold for between \$188.23 and \$214.72 per square foot of living area, including land. The subjects per square foot price of living area is \$210.03, which falls within the per square foot price of the appellant's submitted comparables. As such the Board finds that the appellant failed to meet their burden by a preponderance of the evidence and a reduction in the subject's assessment is not justified.

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

The Board finds the best evidence of assessment equity to be *appellant's comparables*. Like the subject property, these comparables are one-bedroom condominiums with approximately the same size living areas. The dwellings are the same age as the subject dwelling, and they are all situated in the same condominium building as the subject. These comparables had improvement assessments that ranged from \$18.11 to \$18.90 per square foot of living area. The subject's improvement assessment of \$19.87 per square foot of living area falls above the range established by the best comparables in this record. Based on this record the Board finds the appellant *did* demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment *is* 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.



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: October 17, 2023



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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