



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

APPELLANT: 4326-28 S. King Drive Condominium Association
DOCKET NO.: 21-38607.001-R-1 through 21-38607.006-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 4326-28 S. King Drive Condominium Association, the appellant(s), by attorney Joanne Elliott, of Elliott & Associates Attorneys, PLLC in Des Plaines; 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
21-38607.001-R-1	20-03-305-043-1002	5,002	28,314	\$33,316
21-38607.002-R-1	20-03-305-043-1003	4,921	27,853	\$32,774
21-38607.003-R-1	20-03-305-043-1004	3,985	22,560	\$26,545
21-38607.004-R-1	20-03-305-043-1005	3,904	22,098	\$26,002
21-38607.005-R-1	20-03-305-043-1006	4,138	23,421	\$27,559
21-38607.006-R-1	20-03-305-043-1007	4,295	24,315	\$28,610

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 a condominium complex containing seven individual residential condominium units located within the same development. Six of those units are the subject of this appeal. The complex was constructed in 2009 and sits on a 7,685-square-foot site in the City of Chicago, Hyde Park Township, Cook County. The subject units are classified as Class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is predicated upon overvaluation and a contention of law.

In support of the overvaluation claim, the appellant submitted sales data for units located within the seven-unit subject building for the Board's consideration and for comparison to the six units that are the subject of this appeal.

The appellant asserts that, for lien year 2021, the total assessed value placed on the subject units is \$174,988. In support of this position, the appellant submitted a "Summary of Relief Requested" along with additional documentation identifying, among other items, each comparable unit's percentage of ownership interest, corresponding property index numbers, and sales data for five suggested comparable condominium units within the subject building. The reported sales occurred between 2020 and 2021 and ranged from \$266,000 to \$297,000.

The appellant calculated the total sale price of the five comparable properties to be \$1,390,500 and subsequently concluded a total market value for the Association of \$1,635,113. Applying an 8.31% level of assessment, the appellant derived a proposed assessed value of \$135,878. The appellant contends that the recent sales data constitutes compelling—if not conclusive—evidence of market value and that these sales strongly indicate the subject units are worth less than the market values determined by the Assessor. Based on this evidence, the appellant requests that the total assessment be reduced to \$135,878.

For the contention of law portion of the appeal, the appellant argues that the statutory 10% level of assessment for Class 2 property should not apply. The appellant contends that recent sales ratio studies conducted by the Illinois Department of Revenue show that Class 2 property in Cook County had a three-year median level of assessment of 8.31% of market value. The appellant argues that to maintain uniformity of assessment, the subject property should be assessed at no more than 8.31% of market value.

In support of this position, the appellant submitted an Illinois Department of Revenue press release titled *2020 Cook County Final Multiplier Announced*, asserting that it supports the application of an 8.31% assessment level for the subject units.

The appellant submitted a copy of the Board of Review's final 2021 assessment decision for the subject units (PINs 20-03-305-043-1002 through -1007). The Board of Review finalized the total assessed valuation for the subject property at \$174,806 for tax year 2021.

In support of its position regarding the correctness of the assessment, the Board of Review submitted its "Board of Review Notes on Appeal," which reflect an aggregate total assessment of \$174,806 for the units under appeal. No additional evidence was provided in support of the Board of Review's contention that the 2021 assessed valuation is correct.

This matter was scheduled to proceed to hearing. Prior to the hearing, the parties submitted a written request to waive the hearing and have the matter decided based on the evidence previously submitted. The administrative law judge granted the parties' request.

Conclusion of Law

The appellant's appeal is based on overvaluation and contention of law.

The Board may consider appeals based on contentions of law; however, such contentions must relate directly to the correct assessment of the subject property. 86 Ill. Admin. Code §1910.65(d). A party raising a contention of law must submit a brief in support of its position. The standard of proof in this matter is the preponderance of the evidence. 5 ILCS 100/10-15.

As a preliminary matter, the Board assigns no weight to the appellant's assertion that the Illinois Department of Revenue's median level of assessment for recent sales is 8.31%. The appellant submitted no reports, documentation, or corroborating evidence establishing this figure. Unsupported argument alone is insufficient to warrant a reduction. The Board therefore applies the 10% assessment level mandated for Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

When market value is the basis of an appeal, it must be proven by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e). Proof of market value may consist of an appraisal, a recent sale of the subject, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c).

The Board finds that the appellant failed to meet this burden.

The appellant submitted sales data for the subject condominium units, reporting a total aggregate sale price of \$1,390,000 and a proportional ownership interest of 85.04%, resulting in a total indicated market value of \$1,635,113. Applying the 10% assessment level yields an assessed value of \$139,050.

The appellant also submitted the Board of Review's final 2020 assessment decision for the subject units (PINs 20-03-305-043-1002 through -1007), which established a total assessment of \$174,806. This figure exceeds the appellant's proposed assessed value.

The appellant requests a reduction in assessed value for five condominium units based on "comparable sales". However, the sales offered as comparables are the same condominium units that are the subject of this appeal¹². This methodology is improper for determining market value

¹ The residential appeal form submitted by the appellant clearly provides the following instructions for appeals based on comparable sales: ***Provide at least three recent sales of properties comparable to the subject property.*** Complete the entire grid analysis (except assessment data). Include dates of sale and prices paid. Submit a property record card and/or listing sheet for each sale. ***Comparable sales should be similar to the subject in location, size, design, age, and amenities.***

² The property index cards show property index numbers that differ from those of the subject units; however, they also provide detailed descriptions, including the address, unit numbers, and exterior photographs of the condominium complex. Although the PINs for the subject units have clearly changed, the proposed comparable properties are unmistakably the same properties as those that are the subject of this appeal. Additionally, the appellant noted that the

or assessment uniformity. Comparable sales must consist of independent market transactions involving properties that are similar to—but distinct from—the subject. A property cannot serve as a comparable to itself.

In this case, the appellant submitted the subjects' own sales and attempted to use those transactions as comparable sales to demonstrate that the assessments are excessive. Although a recent arm's-length sale of the subject property is generally the best indicator of its market value and could have formed an appropriate basis for an overvaluation appeal, the appellant did not select "recent sale of the subject" as the basis of this appeal. Instead, the appellant mischaracterized the subjects' sales as comparables to other properties, which does not provide the required external market benchmark.

A valid sales comparison approach requires evidence from independent, similar properties to establish a meaningful range of value. By relying solely on the subject units, the appellant fails to meet the burden of proof necessary to demonstrate either overvaluation or lack of assessment uniformity. Because the submission lacks objective, external market data, the requested reduction must be denied.

The Illinois Property Tax Appeal Board is mandated by statute and administrative rule to base its decisions on equity and the weight of the evidence. Accordingly, the Board may consider additional relevant evidence when determining fair cash value in an overvaluation appeal, even if such evidence was not the original focus of the appellant's filing. However, the Board may do so only when due process is preserved. Due process requires that the opposing party—including the Board of Review—receive notice and an opportunity to respond, or that the Board of Review itself submit evidence addressing the issue not raised by the appellant.

In this matter, neither condition was satisfied. The Board of Review did not provide evidence consisting of comparable recent sales that would allow a thorough analysis of the market value of the subject units, nor was any notice given that additional valuation theories or evidence outside the appellant's stated basis would be considered. As such, the Board confined its review to the appellant's evidence supporting the original ground of the appeal.

The appellant's petition for appeal identifies, in Section 2d, "comparable sales" as the sole basis for the appeal. Section 180 of the Property Tax Code (35 ILCS 200/16-180) states that "[e]ach appeal shall be limited to the grounds listed in the petition filed with the Property Tax Appeal Board." In this case, the Board finds that considering evidence outside the ground expressly identified in the appellant's petition would violate due process.

Furthermore, even if the Board were to consider the recent sales of the subject condominium units, the appellant did not provide sufficient documentation to demonstrate that these transactions meet PTAB's requirements for valid, arm's-length sales. The record lacks the necessary supporting

PIN series changed for 2021 and all sales within the development occurred with the previous PIN series of 20-03-304-041-1001 thru -1007.

evidence concerning the conditions of the transactions, including verification of the parties' relationship, exposure to the open market, and whether the sales were free from duress or other atypical influences. Although the recent sales may be relevant to the valuation analysis, the appellant has not provided the evidentiary foundation required to establish that these transactions constitute reliable indicators of the subjects' fair cash value.

While the Board finds that the Board of Review's lack of supporting evidence fails to substantiate its contention regarding the correctness of the assessment, the appellant ultimately bears the burden of proving overvaluation by a preponderance of the evidence. The appellant has not met that burden, and the record does not establish that the subject property is over assessed based on market value

After reviewing all of the evidence, the Board finds that the appellant has not demonstrated by a preponderance of the evidence that the subject property is over assessed. The appellant presented no valid comparable sales or legal basis supporting a reduction.

Accordingly, the Board concludes that the appellant has not met the requisite burden of proof, and the request for a reduction in the subject property's assessment is denied.

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 19, 2026



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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Docket No: 21-38607.001-R-1 through 21-38607.006-R-1

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