



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

APPELLANT: Barbara Flaxman  
DOCKET NO.: 21-39317.001-R-1  
PARCEL NO.: 17-10-309-015-1359

The parties of record before the Property Tax Appeal Board are Barbara Flaxman, the appellant, by attorney Kenneth D. Flaxman, of Attorney & Counsellor at Law 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:

**LAND:** \$147  
**IMPR.:** \$2,221  
**TOTAL:** \$2,368

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 single parking space within an approximately 17-year-old 939-unit condominium building. The subject has a .0437% ownership interest in the condominium and is located in Chicago, South Chicago Township, Cook County.<sup>1</sup> 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 information on 11 comparable sales located within the subject's building. The comparables consist of single parking spaces with ownership interests ranging from .035%

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<sup>1</sup> The parties differ as to the subject's ownership interest in the condominium. The Board finds the subject has a .0437% ownership interest, which was supported by the Declaration of Condominium pages submitted by the appellant.

to .0525%. The comparables sold from October 2019 to September 2021 for prices ranging from \$14,000 to \$32,000. Based on this evidence, the appellant requested a reduced assessment of \$2,368, for an estimated market value of \$23,680, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$5,999. The subject's assessment reflects a market value of \$59,990, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a document entitled Condominium Analysis Results for 2021, which was based on the sales of 145 units in the subject's building to estimate the value of the condominium under appeal. The board of review arrived at a total consideration for the 145 sales of \$58,186,562. The board of review analysis indicated these properties had a combined 17.0771% 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 \$340,728,590. Multiplying the full value of the condominium building by the percentage ownership of the unit under appeal, which was reported to be .0193%, results in a market value of \$65,761 or an assessed value of \$6,576 when applying the 10% Ordinance level of assessment for class 2-99 property.

In rebuttal, the appellant argued that the board of review did not submit any evidence to support its sales, that the sales occurred too remote in time from the assessment date at issue, and that the board of review did not identify which of the sales were for individual parking spaces or which portions of the sale prices were allocated to parking spaces.

### **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 Board finds the best evidence of market value to be the appellant's comparable sales #1 through #5, #7, and #9 through #11, which are similar sales of individual parking spaces like the subject. These most similar comparables sold from June 2020 to September 2021 for prices ranging from \$14,000 to \$32,000. The subject's assessment reflects a market value of \$59,990, which is above the range established by the best comparable sales in this record. The Board gives less weight to the appellant's comparables #6 and #8, which sold less proximate to the January 1, 2021 assessment date at issue in this appeal. The Board also gives reduced weight to the board of review's analysis, which includes sales that occurred less proximate in time to the assessment date at issue. Further, the sales appear to include both inhabitable residential units and parking spaces within the subject's condominium. The board of review did not designate with any clarity which sales included parking spaces. Additionally, the board of review did not

explain whether the amounts attributed to the parking spaces in its Condominium Analysis were the result of an of allocation of the total purchase price for both the residential condominium and the associated parking space and the basis for the allocation. Based on the evidence in this record, the Board finds a reduction in the subject's assessment commensurate with the appellant's request 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: \_\_\_\_\_

August 19, 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

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