



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

APPELLANT: 1738 Elmdale LLC
DOCKET NO.: 21-40325.001-R-1
PARCEL NO.: 04-35-307-063-1006

The parties of record before the Property Tax Appeal Board are 1738 Elmdale LLC, the appellant, by attorney Anne E. Edelman-Larsen, of the Law Offices of Frank A. Edelman, Ltd. 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 **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:

LAND: \$5,251
IMPR.: \$63,553
TOTAL: \$68,804

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 multi-story residential condominium unit with 2,200 square feet of living area that is approximately 15 years old. Features include 3 bedrooms, 3.5 bathrooms, central air conditioning, a fireplace, and a 2-car garage. The subject has a 14.0000% interest in the common elements of the condominium. The property has a 30,616 square foot site and is located in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on February 16, 2022 for a price of \$545,500. The appellant completed Section IV of the appeal petition disclosing the parties to the sale were not related, the property sold using a realty firm and agent and was listed for sale through the Multiple Listing Service for 5 months, and the sale was not due to

foreclosure or by contract for deed. In support of the sale, the appellant submitted a copy of a settlement statement indicating realtors' commissions were paid and indicating the seller gave a \$15,000 credit to the buyer at closing. The appellant also submitted listing information describing the subject unit.

The appellant submitted a final decision of the board of review disclosing a total assessment for the subject of \$68,802. The subject's assessment reflects a market value of \$688,020 or \$312.74 per square foot of living area, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal."¹ In support of its contention of the correct assessment the board of review submitted a sales analysis based on three comparable sales within the subject's condominium. These comparables sold from November 2020 to October 2021 for prices ranging from \$545,000 to \$585,000, with an aggregate sale price of \$1,677,500. The comparables each have a 9.0000% ownership interest in the common elements of the condominium, with a combined interest of 27.0000%. Based on these sales, a value of \$6,212,962 was computed for the condominium.² 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.Adm.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.Adm.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.

The Board finds the best evidence of market value to be the sales analysis presented by the board of review, which relied on three sales within the subject's condominium that occurred proximate in time to the assessment date. The Board gave less weight to the subject's sale due to the fact the sale occurred less proximate in time to the assessment date at issue (more than 13 months) and included a \$15,000 credit to the buyer without explaining the reason for the credit, calling into question the arm's length nature of the sale. Based on this record, the Board finds the subject's assessment is reflective of market value and a reduction in the subject's assessment is not justified.

¹ The Board notes the board of review reported a total assessment for the subject that differs from the board of review final decision submitted by the appellant.

² From this sales analysis, the Board calculates a value of \$869,815 for the subject based on its 14.0000% interest.

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: _____

April 15, 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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