



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

APPELLANT: 802-04 West Wolfram Condominiums
DOCKET NO.: 21-41855.001-R-1 through 21-41855.008-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 802-04 West Wolfram Condominiums, the appellant(s), by attorney Frederick Agustin, of the Law Offices of Samuel V.P. Banks 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-41855.001-R-1	14-29-226-054-1001	21,070	63,929	\$84,999
21-41855.002-R-1	14-29-226-054-1002	21,070	63,929	\$84,999
21-41855.003-R-1	14-29-226-054-1003	16,555	50,444	\$66,999
21-41855.004-R-1	14-29-226-054-1004	16,555	50,444	\$66,999
21-41855.005-R-1	14-29-226-054-1005	18,060	54,939	\$72,999
21-41855.006-R-1	14-29-226-054-1006	18,060	54,939	\$72,999
21-41855.007-R-1	14-29-226-054-1007	19,565	59,434	\$78,999
21-41855.008-R-1	14-29-226-054-1008	19,565	59,434	\$78,999

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 improved with a 19-year-old, three-story, eight-unit residential condominium building of masonry construction. The appeal is of the entire eight-unit subject. Each unit is designated by a Property Index Number (PIN). The property is situated on 8,600

square feet of land in Lake View Township, Cook County. It is 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 its contention of the correct assessment, the appellant submitted a condominium analysis with information on suggested comparable sale for one unit in the building, PIN 1006. This unit sold in 2019 for a total consideration of \$709,000. PIN 1006 comprised of 14.00% the common elements of the building. The result was a full value of the property at \$5,428,571.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$607,992. The subject's assessment reflects a market value of \$6,079,920 when applying the 2021 level of assessment of 10.00% 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 condominium analysis with information on suggested comparable sales for two units in the building, PINs 1006 and 1008. PIN 1006 sold in 2019 for \$709,000; PIN 1008 sold in 2021 for \$830,000, for a total consideration of \$1,539,000.¹ The units sold comprised of 25.00% the common elements of the building. The result was a full value of the property at \$6,156,000.

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.

The Board finds the best evidence of market value to be the board of review's condominium analysis. Although both parties cited PIN 1006, the board of review broadened its analysis to include PIN 1008, which sold closer to the lien year than PIN 1006. This leads to greater reliability of the analysis. Based on this evidence, the Board finds a reduction in the subject's assessment is not justified.

¹ The appellant and the board of review cited the same sale of PIN 1006 in their respective analyses.

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:

February 18, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

802-04 West Wolfram Condominiums, by attorney:
Frederick Agustin
Law Offices of Samuel V.P. Banks
221 N. LaSalle Street
38th Floor
Chicago, IL 60601

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602