



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

APPELLANT: 1955 N Seminary Condominium Association
DOCKET NO.: 21-41872.001-R-1 through 21-41872.005-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 1955 N Seminary Condominium Association, the appellant, by attorney James Dooley, of Reilly & Dooley, LLC 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-41872.001-R-1	14-32-402-026-1001	12,000	33,400	\$45,400
21-41872.002-R-1	14-32-402-026-1002	8,400	23,380	\$31,780
21-41872.003-R-1	14-32-402-026-1003	8,400	23,380	\$31,780
21-41872.004-R-1	14-32-402-026-1004	600	1,670	\$2,270
21-41872.005-R-1	14-32-402-026-1005	600	1,670	\$2,270

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 3-unit residential condominium building that is approximately 130 years old, together with two garage parking spaces. Features include a first-floor 2-bedroom/2-bathroom duplex unit with 1,500 square feet of living area and second and third floor 1-bedroom/1-bathroom units each with 1,050 square feet of living area. The property has a 2,400 square foot site and is located in Chicago, North Chicago Township, Cook County. 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 an appraisal estimating the subject property had a market value of \$1,135,000 as of January 1, 2021. The appraisal was prepared by William L. Shulman and Mitchell J. Perlow, certified general real estate appraisers, for ad valorem tax purposes.

The appraisers developed the sales comparison approach for the subject property. For the subject's two 1-bedroom/1-bathroom units, the appraisers selected five 2-bedroom/1-bathroom comparables depicted in close proximity to the subject on a map within the appraisal. The comparables range in size from 1,100 to 1,400 square feet of living area and range in age from 92 to 138 years old. Two comparables each have a garage parking space and one comparable has an exterior parking space. The comparables sold from June to September 2020 for prices ranging from \$352,500 to \$390,000 or from \$271.43 to \$331.82 per square foot of living area, including land. The appraisers adjusted the comparables for differences from the subject to arrive at an estimated value of \$325.00 per square foot or \$682,500 for the subject's two 1-bedroom/1-bathroom units. The appraisers noted one of the subject's 1-bedroom/1-bathroom units lacks a garage parking space.

For the subject's one 2-bedroom/2-bathroom unit, the appraisers selected two 2-bedroom/1-bathroom units, one 2-bedroom/1.5-bathroom unit, and two 2-bedroom/2.5-bathroom units that are depicted in close proximity to the subject on a map within the appraisal. The comparables range in size from 1,500 to 1,900 square feet of living area and range in age from 36 to 140 years old. Four comparables each have an exterior parking space. The comparables sold from March to September 2020 for prices ranging from \$360,000 to \$555,000 or from \$240.00 to \$305.94 per square foot of living area, including land. The appraisers adjusted the comparables for differences from the subject to estimate a value of \$300.00 per square foot or \$450,000 for the subject's 2-bedroom/2-bathroom unit.

The appraisers concluded value of \$1,135,000 rounded for the entire subject property as of January 1, 2021. Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" on July 7, 2023 disclosing the total assessment for the subject of \$49,600. The subject's assessment reflects a market value of \$496,000 or \$330.67 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment, the board of review commented that it gave consideration to the appellant's appraisal, which reported smaller unit sizes than the listing sheets for their most recent sales. The board of review also stated it relied on four comparable sales, which were listed with addresses, sale prices, and some descriptive information in a narrative format, and were not presented on the Board's prescribed forms as required by Section 1910.80 of the Board's procedural rules (86 Ill. Adm. Code § 1910.80). The Board issued Standing Order No. 2 that applies to all matters filed after February 28, 2023, whereas all parties, including appellants, intervenors and boards of review are ordered to use the Board's prescribed forms in accordance with Section 1910.80 of the Board's procedural rules whether a party is filing by paper or through the e-filing portal. Any party not complying with the Board's rules

will be subject to sanctions. The sanction is to give any evidence not submitted on the proper form zero weight. Therefore, pursuant to the Board's strict application of Section 1910.80, as articulated in Standing Order No. 2, the list of comparable properties submitted by the board of review is given no weight. Based on this evidence, the board of review requested the subject's assessment be sustained.

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

The Board finds the only evidence of market value to be the appraisal submitted by the appellant. The Board finds the appraisers selected similar comparables that sold proximate in time to the assessment date and made reasonable adjustments to these comparables for differences from the subject in estimating the subject's market value as of the assessment date. The Board finds the subject had a market value of \$1,135,000 as of the assessment date. Based on this evidence, 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: _____

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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