



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

APPELLANT: Broc Christensen
DOCKET NO.: 21-46698.001-R-1
PARCEL NO.: 14-33-307-074-1001

The parties of record before the Property Tax Appeal Board are Broc Christensen, the appellant, by attorney Glenn L. Udell, of Brown, Udell, Pomerantz, DelRahim 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: \$10,726
IMPR.: \$51,853
TOTAL: \$62,579

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 residential condominium unit that is located in a condominium building that contains 4 units. The condominium building is approximately 87 years old. The subject unit contains 1,915 square feet of living area and features two full baths, a fireplace, and central air conditioning. The subject unit has a 29% interest in the common elements of the condominium property. The property has a 2,959 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 Exterior Residential Broker Price Opinion estimating the subject property had a market value of \$557,000 as of September 24, 2021. In estimating the value of the subject property, the broker used three comparable sales and three comparable listings. The comparable

sales range in size from 1,600 to 2,000 square feet of living area and are 130 or 141 years old. Each comparable has central air conditioning, one fireplace and two or three full baths. The comparables sold from June to September 2021 for prices ranging from \$525,000 to \$625,000.

In the appellant's petition and in the brief, counsel disclosed an appraisal was submitted to support the appellant's overvaluation argument. However, on page 10 of the broker price opinion report the Addendum Disclaimer stated this document is not an appraisal as defined by USPAP (Uniform Standards of Professional Appraisal Practice). It is not to be considered an appraisal and may not be used as such for any purpose.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$66,999. The subject's assessment reflects a market value of \$669,990 when applying the level of assessment of 10% 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 sales analysis prepared by Ashton Language, an analyst with the Cook County Board of Review. The analyst provided sales data on 1 residential unit that sold in the subject's condominium property that contains a total of 4 units. The sale occurred in July 2022 for a price of \$410,000 with a total adjusted consideration of \$410,000. The board of review analysis indicated this unit had a 19% ownership interest in the condominium. The total adjusted consideration was then divided by the total percentage of interest of ownership in the condominium property for the unit that sold to arrive at an indicated full value for the property of \$2,157,894. Next, apply the percentage of interest of ownership for the unit under appeal of 29% to the full value for the property to arrive at a full value of \$625,789 and an assessment of \$62,579, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant contends the sale submitted by the board of review is not relevant to the 2022 tax year but still warrants a relief if considered by the Property Tax Appeal Board.

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 a reduction in the subject's assessment is warranted based on the evidence in the record.

The Board gives no weight to the conclusion of value in the appellant's purported appraisal as the evidence submitted was not an appraisal and was not to be used as such for any purpose as stated in the Addendum disclaimer of the Exterior Residential Broker Price Opinion.

The Board finds the best evidence of market value in the record to be the condominium analysis presented by the board of review using one recent sale, that occurred in July 2022 for a price of

\$410,000. Using this sale and the residential unit's corresponding percentage of ownership interest in the condominium, the board of review arrived at a total value for the subject's condominium complex of \$2,157,894. Multiplying the full market value of the complex by the subject's percentage of ownership interest of 29% results in an estimated value for the subject property of \$625,789, which is less than the market value reflected by the subject's assessment of \$66,999.

Based on this record the Board finds a reduction in the subject's assessment 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:

May 20, 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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