



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

APPELLANT: Monika Sularz
DOCKET NO.: 22-20238.001-R-1
PARCEL NO.: 12-12-425-009-1134

The parties of record before the Property Tax Appeal Board are Monika Sularz, the appellant, by Scott Shudnow, attorney-at-law of Shudnow & Shudnow, 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 **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: \$1,351
IMPR.: \$33,949
TOTAL: \$35,300

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 2022 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 with 1,800 square feet of living area located on the fourth floor of a six-story building of brick or masonry exterior construction. The condominium building has 180 units, two elevators, and is approximately 15 years old. Features of the subject unit include central air conditioning, two bedrooms, 2½ bathrooms, two balconies, and a 1-car garage. The condominium complex has a 132,412 square foot site located in Harwood Heights, Norwood Park Township, Cook County. The subject is classified as a class 2-99 residential condominium 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 \$353,000 as of January 1, 2022. The appraisal was prepared by Garry Nusinow, an Illinois Certified

General Real Estate Appraiser. The appellant was identified as the client. The purpose of the appraisal was to develop an opinion of market value that is to be used to provide a basis for the appeal of the assessment placed against the property for ad valorem taxation. The fee simple property rights were appraised. The highest and best use of the property was determined to be the property's current use as an attached condominium residence. The appraiser indicated an interior and exterior inspection of the property was made on July 28, 2022.

The appraiser stated in the report that the subject's maintenance, quality of construction, unit mix and appeal to the market is average. The appraiser further indicated the subject property is in average to above average condition. Nusinow described the common elements of the property as including the lobby, halls, garage, storage, green area, elevators, exercise room, roof, and elevator. The property has a fitness area on its first floor. The property has Homeowner Assessment (HOA) fees of \$546 per month.

Nusinow developed the sales comparison approach to value using five comparable sales of residential condominium units that ranged in size from 1,510 to 1,934 square feet of living area. Each of the units is 15 years old. Four of the comparables have two bedrooms and two bathrooms. Comparable #5 has three bedrooms and three bathrooms. Each comparable has central air conditioning, one or two balconies, and a 1-car or 2-car garage. These properties have HOA fees that range from \$429 to \$565 per month. Three comparables are located on the 6th floor of their building and two comparables are located on the 5th floor of their building. Comparables #1 and #3 are located in the same building as the subject, and comparables #2 and #4 are in the same association as the subject. The comparables are located along the same street as the subject and within .04 of a mile of the subject. The sales occurred from July 2020 to March 2022 for prices ranging from \$345,000 to \$394,000 or from \$200.33 to \$228.48 per square foot of living area.

The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$341,500 to \$374,000. The appraiser indicated that sale #2 required a downward adjustment as its seller received a credit at closing. The appraiser asserted that sales #3 and #4 required downward adjustments of approximately 2.5 percent of their sale prices for time of sale as MRED MLS data indicated a decline in value from 2020 to 2021 for condominium residences in this market area at between 2.5% and 5%. The appraiser contends sales #1, #2 and #4 required \$5,000 downward adjustments for their superior penthouse floor locations. The appraiser stated that all sales required downward adjustments for their superior southern exposure view as southern exposures allow for more brightness due to Chicago's geographic location that positions the sun's predominant presence in the southern sky versus the northern sky. Sale #5 required a downward adjustment for its superior upgraded condition at approximately \$10 per square foot of its gross living area. Sales #1, #2, #3 and #4 required upward adjustments for their inferior bath counts, while sale #5 required a downward adjustment for its superior bath count; these adjustments were made at \$5,000 per half bath. Sale #4 required an upward adjustment for its inferior smaller gross living area. Conversely, sale #5 required a downward adjustment for its superior larger gross living area. The adjustment for size was made if the difference in gross living area exceeded 100 square feet, then adjusted at \$50 per square foot and rounded to the nearest \$1,000. The appraiser asserted all other necessary adjustments were made as indicated in the Sales Comparison Analysis Grid. The appraiser explained that all sales were given weight in the order of their sale number with sale #1 weighted

the most and sale #5 weighted the least, which provided a reasonable range to derive an accurate opinion of market value for the subject. In the final analysis, the appraiser concluded that the estimated market value of the subject property using the sales comparison approach was \$353,000.

The appellant requested the subject's assessment be reduced to \$35,300 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$43,315. The subject's assessment reflects a market value of \$433,150 when applying the level of assessment for class 2-99 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 submitted a document titled Condominium Analysis Results for 2022 for the subject's condominium complex. The analysis listed the various parcel numbers associated with the subject's condominium and their respective ownership interest in the common elements. The analysis disclosed the subject property has a .7850% ownership interest in the common elements. The condominium analysis included 38 sales of residential condominium units in the subject's condominium that had a total interest in the common elements of the condominium of 20.3590%. The 38 units sold from January 2019 to October 2022 for prices ranging from \$52,000 to \$410,000. The board of review indicated the total consideration of the 38 sales was \$11,640,750 and the total adjusted consideration for the sales was also \$11,640,750. Dividing the total adjusted consideration by the percentage of interest of the units sold resulted in an estimated market value for the subject's condominium complex of \$57,177,415. Multiplying the market value of the complex by the subject's percentage of interest in the common elements of .7850% resulted in an estimated market value for the subject unit of \$448,843 and a total assessment of \$44,884 when applying the level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance of 10%, which is greater than the subject's total assessment of \$43,315.

In rebuttal appellant's counsel argued the board of review did not submit a full, professional appraisal report to refute the appellant's appraisal but submit a list of 38 raw, unadjusted sales within the subject's building. The appellant's counsel contends there are no property descriptions for any of the sales and no adjustments to consider square footage, upgrades, unit layout, condition, or number of bedrooms. The appellant's counsel asserted that the appellant's professional appraisal report is a much more specific and accurate indicator of the subject's fair market value on January 1, 2022, as the appellant's appraiser considered specific property characteristics and made professional adjustments to reflect differences in these characteristics.

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 appraisal submitted by the appellant estimating the subject had a market value of \$353,000 as of January 1, 2022. The report disclosed the appraiser inspected the interior and exterior of the subject property. The appraiser developed the sales comparison approach to value and selected comparables sales that were similar to the subject in location and improved with residential condominium units relatively similar to the subject in age, size and features. The sales occurred relatively close to the assessment date at issue for prices ranging from \$345,000 to \$394,000 or from \$200.33 to \$228.48 per square foot of living area. The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$341,500 to \$374,000. The appraiser explained the adjustment process, which appeared logical, and was not refuted by the board of review. The appraised value of \$353,000 is less than the market value reflected by the subject's total assessment of \$433,150.

The Board gives less weight to the comparable sales analysis submitted by the board of review. The board of review provided a listing of 38 sales within the subject's condominium but provided no property characteristics such as size, bedroom count, bathroom count or location within the building that would aid in determining the similarity of the sales to the subject property. Based on this analysis the board of review ultimately determined the subject had a market value of \$448,843, however, none of the sales used in the analysis sold for an amount equal to or greater than this estimate. Of the 38 sales presented by the board of review the highest price occurred in February 2020 for \$410,000, which is below the market value reflected by the subject's assessment and below the subject's estimated market value as determine in the board of review comparative sales analysis. Additionally, performing a cursory examination, dividing the total adjusted consideration of the units that sold of \$11,640,750 by the number of units that sold (38) results in an average purchase price of approximately \$306,336, which also undermines the conclusion of value developed by the board of review and lends support to the conclusion the subject property is overvalued. Due to these issues, the Board has given little weight to the evidence and conclusion of value submitted by the board of review.

Based on this evidence the Board finds a reduction in the subject's assessment commensurate with the appellant's request to reflect the appraised value is appropriate.

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: _____

October 21, 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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