

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Lawrence Point Condominium Association DOCKET NO.: 22-20572.001-R-1 through 22-20572.039-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Lawrence Point Condominium Association, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
22-20572.001-R-1	12-12-329-022-1001	1,691	17,346	\$19,037
22-20572.002-R-1	12-12-329-022-1002	1,645	16,875	\$18,520
22-20572.003-R-1	12-12-329-022-1003	1,623	16,646	\$18,269
22-20572.004-R-1	12-12-329-022-1004	1,555	15,953	\$17,508
22-20572.005-R-1	12-12-329-022-1005	1,352	13,867	\$15,219
22-20572.006-R-1	12-12-329-022-1006	1,555	15,953	\$17,508
22-20572.007-R-1	12-12-329-022-1007	1,307	13,402	\$14,709
22-20572.008-R-1	12-12-329-022-1008	1,307	13,402	\$14,709
22-20572.009-R-1	12-12-329-022-1009	1,511	15,495	\$17,006
22-20572.010-R-1	12-12-329-022-1010	1,623	16,646	\$18,269
22-20572.011-R-1	12-12-329-022-1011	1,645	16,875	\$18,520
22-20572.012-R-1	12-12-329-022-1012	1,691	17,346	\$19,037
22-20572.013-R-1	12-12-329-022-1013	1,443	14,795	\$16,238
22-20572.014-R-1	12-12-329-022-1014	2,188	22,441	\$24,629
22-20572.015-R-1	12-12-329-022-1015	1,691	17,346	\$19,037
22-20572.016-R-1	12-12-329-022-1016	1,668	17,111	\$18,779
22-20572.017-R-1	12-12-329-022-1017	1,601	16,417	\$18,018
22-20572.018-R-1	12-12-329-022-1018	1,443	14,795	\$16,238
22-20572.019-R-1	12-12-329-022-1019	1,646	16,882	\$18,528
22-20572.020-R-1	12-12-329-022-1020	1,352	13,867	\$15,219
22-20572.021-R-1	12-12-329-022-1021	1,352	13,867	\$15,219
22-20572.022-R-1	12-12-329-022-1022	1,555	15,953	\$17,508
22-20572.023-R-1	12-12-329-022-1023	1,668	17,111	\$18,779
22-20572.024-R-1	12-12-329-022-1024	1,691	17,346	\$19,037
22-20572.025-R-1	12-12-329-022-1025	1,736	17,804	\$19,540

22-20572.026-R-1	12-12-329-022-1026	1,488	15,266	\$16,754
22-20572.027-R-1	12-12-329-022-1027	2,188	22,441	\$24,629
22-20572.028-R-1	12-12-329-022-1028	1,691	17,346	\$19,037
22-20572.029-R-1	12-12-329-022-1029	1,668	17,111	\$18,779
22-20572.030-R-1	12-12-329-022-1030	1,601	16,417	\$18,018
22-20572.031-R-1	12-12-329-022-1031	1,397	14,331	\$15,728
22-20572.032-R-1	12-12-329-022-1032	1,601	16,417	\$18,018
22-20572.033-R-1	12-12-329-022-1033	1,352	13,867	\$15,219
22-20572.034-R-1	12-12-329-022-1034	1,352	13,867	\$15,219
22-20572.035-R-1	12-12-329-022-1035	1,555	15,953	\$17,508
22-20572.036-R-1	12-12-329-022-1036	1,668	17,111	\$18,779
22-20572.037-R-1	12-12-329-022-1037	1,691	17,346	\$19,037
22-20572.038-R-1	12-12-329-022-1038	1,736	17,804	\$19,540
22-20572.039-R-1	12-12-329-022-1039	1,488	15,266	\$16,754

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 consists of 39 residential condominium units located in a building that is approximately 39 years old. The residential units on appeal have a combined 100% ownership interest in the condominium. The condominium has a 47,722 square foot site located in Chicago, Norwood Park Township, Cook County. The subject residential units are classified as class 2-99 properties under the Cook County Real Property Assessment Classification Ordinance.

The appellant filed the appeal as a market value appeal along with a landscape document, asserting seven recent sales along with supporting RealInfo prinouts. The sales are each located in the subject building and occurred from April 2021 to April 2022 for prices ranging from \$168,000 to \$224,000.\frac{1}{2}\$ The appellant reported a combined ownership interest in the seven sales within the condominium of 17.81\%. The properties reportedly sold for an asserted aggregate sales price of \$1,349,000 which, after correcting the sale price of one unit, is \$1,344,000. Based on this analysis, the appellant opined the subject building has an estimated market value of \$7,546,322 $(1,344,000 \div 17.81\%)$. Next, in the brief the appellant depicts a 10\% deduction for "personalty" of \$757,354, which is not further supported in the record, results in a purported total building value of \$6,816,192. Then, with the 10\% level of assessment applied, the subject

¹ Examination of the supporting documentation for unit -1029 depicts an error in the landscape document. This property sold for \$5,000 less than reported by the appellant, or for \$195,000.

² Based on the necessary mathematical equation, the Board finds the appellant's reported resulting building value of \$7,573,546 is erroneous.

parcels should have a combined total assessment of \$681,619. Based on the foregoing, the appellant requested reductions be issued for the 39 residential parcels on appeal.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the assessment for the 39 subject parcels of \$698,099. The subject's assessment reflects a market value of \$6,980,990, 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 submitted a document entitled Condominium Analysis Results for 2022 prepared by Lucas Schumann in which eight sales of parcels in the condominium were outlined. Six sales were the same ones presented by the appellant. The parties disagreed on the sale price of unit -1029 by \$5,000 and the board of review presented an additional 2019 sale of unit -1038 that was not presented by the appellant. As presented by the board of review, the sales from January 2019 to April 2022 depict an aggregate sale price of the residential units of \$1,526,500. The sales depict a combined ownership interest in the sold units of 20.611% resulting in a conclusion of the full value of the condominium of \$7,406,239. Next, the analysis depicts an assessment for the condominium building of \$740,624, rounded, when applying the Ordinance level of assessment for class 2-99 property of 10%, which is above the current assessment of the parcels on appeal. Based on the foregoing, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

As an initial matter, the Board gives no weight to the appellant's 10% adjustment for personalty that was applied to the sales presented by the appellant. The Board further finds nothing in the record supported such a purported "personalty" adjustment. In addition, since the brief containing this adjustment was prepared by counsel, the Board also finds that an attorney cannot act as both an advocate for a client and also provide unbiased, objective opinion evidence of value for that client's property.

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 no reduction in the subject's assessment is warranted on this record.

The appellant submitted data on the sales of seven properties located in the subject condominium and the board of review submitted data on those same sales along with an additional 2019 sale of a residence located in the subject condominium for the Board's consideration, where the parties also have a \$5,000 discrepancy as to the sale price of one common unit addressed earlier in Footnote 1. The Board finds the appellant erred in reporting the sale price of unit -1029 as noted based upon the supporting documentation. The appellant also did not address by rebuttal whether the 2019 sale presented by the board of review should be considered.

Based on the sales price error and the unsupported deduction for personalty, the Board has given reduced weight to appellant's analysis which failed to accurately reflect the building value based

on recent sales since erroneous data was used in the analysis along with an unsupported calculation to further reduce the aggregate sales price data. Furthermore, in the absence of any rebuttal from the appellant to refute the board of review's 2019 sale data, the Board has accepted the data from the board of review which appears to be more comprehensive and mathematically accurate.

The Property Tax Appeal Board finds that the best and most proximate sales in the record from within the subject's condominium building consist of eight properties which sold from January 2019 to April 2022. These sales reflect an aggregate sales price of \$1,526,500. These sales depict an aggregate ownership interest of the properties that sold of 20.611% resulting in a full market value for the subject condominium building of \$7,406,239. At the 10% level of assessment, the subject 39 condominium units would be assessed at \$740,624, rounded.

As the record makes clear, the current total assessment of the 39 residential units on appeal is \$698,099. In the alternative, if the 2019 sale price were removed from the analysis, the result would be a full building value of \$7,546,322 resulting in a total assessment of \$754,632, which is still higher than the subject's current total assessment. Thus, on this record, the Property Tax Appeal Board finds the evidence establishes by a preponderance of the evidence that no reduction is warranted as to the subject condominium building based on the most recent sales.

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.

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a R	asort Soffen
Member	Member
Dan Dikini	Sarah Bokley
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:	November 25, 2025		
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	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 <u>PETITION AND EVIDENCE</u> 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

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COUNTY

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