



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

APPELLANT: 1851 Whipple Condominium Association
DOCKET NO.: 22-35601.001-R-1
PARCEL NO.: 13-36-311-044-1001

The parties of record before the Property Tax Appeal Board are 1851 Whipple 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 **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: \$3,058
IMPR.: \$22,942
TOTAL: \$26,000

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 is a condominium unit in the basement of a 106-year-old, three-unit building of masonry construction with central air conditioning. The subject unit has four rooms in total, two bedrooms, a full bathroom, and 1,077 square feet of living area. The owner has the right to use a parking space in the building's garage. The subject is located on a 3,800 square foot site in Chicago, West Chicago, Cook County. It is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts 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 \$260,000, as of January 1, 2022. The appraiser relied on the sales comparison approach and used data from sales of three suggested comparable properties, all of which were residential condominium units located in basements. The sales took place between November 2020 and April 2021, for

amounts ranging from \$205,000 to \$243,500 or from \$214.44 to \$279.47 per square foot of living area. The appraiser adjusted the sales prices to account for differences between the subject and the comparables. The adjusted sales prices for the three comparables were \$258,500, \$276,500, and \$233,600. The appraiser gave the greatest weight to comparables one and two because they are in the same neighborhood as the subject, although all three comparables are within a half mile of the subject. Photographs of the subject's interior and building exterior were included with the appraisal.

The board of review submitted its "Board of Review Notes on Appeal" stating that the subject's total assessment was \$29,660. The subject's assessment reflects a market value of \$296,600, or \$275.39 per square foot of living area, when using the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The board of review also submitted its Condominium Analysis Results for 2022. This analysis included data from recent sales of the other two units in the subject building. The total consideration for those sales was \$685,000, and those units represented a 68.4410% ownership interest in the common elements. Thus, the full value of all three units was \$1,000,862 under this analysis, and the subject unit's fair market value was \$315,812.

Conclusion of Law

The appellant contends that the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of an appeal, the value of the property must be proved by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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.

This Board finds that the appraisal is the best evidence of the subject's value. The appraiser used the sales comparison approach, relying on data from sales of three comparable properties within half a mile of the subject. It is significant that the subject is a basement unit, and the comparables used in the appraisal were all basement units. The appraiser adjusted the sales prices of the comparables to account for differences between them and the subject. In contrast, the board of review's analysis used unadjusted sales data, and neither of the sales relied upon was a basement unit.

Accordingly, the appellant has shown overvaluation by a preponderance of the evidence, so a reduction in the subject's assessment is warranted. This Board concludes from the evidence that the subject's fair market value as of January 1, 2022, was \$260,000, and the proper assessment is 10% of that, or \$26,000.

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 21, 2026



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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