



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

APPELLANT: 12-13 Conti Pkway Condominium Association
DOCKET NO.: 22-35785.001-R-1 through 22-35785.006-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 12-13 Conti Pkway 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
22-35785.001-R-1	12-25-312-038-1004	976	15,746	\$16,722
22-35785.002-R-1	12-25-312-038-1005	948	15,297	\$16,245
22-35785.003-R-1	12-25-312-038-1006	1,073	17,309	\$18,382
22-35785.004-R-1	12-25-312-038-1007	975	15,720	\$16,695
22-35785.005-R-1	12-25-312-038-1008	950	15,314	\$16,264
22-35785.006-R-1	12-25-312-038-1009	1,076	17,358	\$18,434

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 six residential condominium units within a 2-story residential condominium building of brick exterior construction that is approximately 95 years old. The subject parcels have a combined 63.51% interest in the common elements of the condominium.¹

¹ The parties differ regarding the percentage of ownership of the subject units. The appellant reported the condominium has six units with a combined 100% interest whereas the board of review reported the subject has eleven units with eight units having a combined 67.3360% interest and the six subject parcels having a combined 63.51% interest. The Board finds the best evidence of the condominium's units and ownership interest is found in the board of review's evidence.

The property has a 7,000 square foot site and is located in Elmwood Park, Leyden 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 information on one sale within the subject's condominium. This property, which has a 10.32% interest in the common elements of the condominium, sold in February 2020 for a price of \$168,000. Based on this sale, the appellant computed an aggregate value of \$1,030,675 for the subject units, from which the appellant deducted 10% for personal property. The appellant requested a reduction in the subject's assessment to \$92,760 to reflect this aggregate value less 10% for personal property.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total combined assessment for the subject of \$102,742. The subject's assessment reflects a market value of \$1,027,420, 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 sales analysis based on the same sale in the subject's condominium that was reported by the appellant. Based on this sale, the board of review computed a full value for the condominium of \$1,627,906 and a value of \$1,096,166 for eight units within the condominium. The Board computes an aggregate value of \$1,033,883 for the six subject parcels. 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.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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the sales analysis presented by the board of review. The Board finds both parties submitted a sales analysis based on the same sale within the subject's condominium. However, the Board finds the appellant's deduction of 10% for personal property to be unsupported by any evidence in the record. Moreover, the Board finds the appellant did not use the correct ownership percentages in computing the value of the subject parcels. Based on this evidence, the Board finds a reduction in the subject's assessment is not 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: _____

August 19, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

12-13 Conti Pkway Condominium Associatio, by attorney:
Dora Cornelio
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602