



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

APPELLANT: 3414-18 N. Sheffield Condominium Assoc
DOCKET NO.: 22-41826.001-R-1 through 22-41826.008-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 3414-18 N. Sheffield Condominium Assoc, 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
22-41826.001-R-1	14-20-412-048-1001	19,961	22,061	\$42,022
22-41826.002-R-1	14-20-412-048-1002	20,377	22,522	\$42,899
22-41826.003-R-1	14-20-412-048-1004	19,961	20,595	\$40,556
22-41826.004-R-1	14-20-412-048-1005	20,794	21,454	\$42,248
22-41826.005-R-1	14-20-412-048-1006	22,044	22,744	\$44,788
22-41826.006-R-1	14-20-412-048-1007	19,961	20,595	\$40,556
22-41826.007-R-1	14-20-412-048-1008	20,794	21,454	\$42,248
22-41826.008-R-1	14-20-412-048-1009	22,897	23,625	\$46,522

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 eight residential condominium units within a 15-year old building of brick exterior construction. The subject parcels have a combined 84.06% interest in the common elements of the condominium. The property has a 13,228 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant reported in the grid analysis that the subject parcels ending in -1004, -1005, -1007, -1008, and -1009 sold from November 2020 to April 2022 for prices ranging from \$440,000 to \$525,000. The appellant computed an aggregate sale price of \$2,338,500 for these sales and a combined interest of 52.62% in the common elements of the condominium for these properties. The appellant computed a value for the condominium of \$4,444,128, then allocated this value for each subject parcel and deducted 10% for personal property included in the sales. The appellant arrived at a total value for the subject parcels of \$3,370,560.

In support of the sales, the appellant submitted copies of deeds for four of these sales, which indicate subject parcels -1005, -1007, -1008, and -1009 sold together with other parcels in the condominium, -1018, -1010, -1012, and -1015, respectively. The appellant also submitted a listing sheet for the sale of subject parcel -1008 and for other sales or listings within the condominium that were not presented in the grid analysis.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$337,058.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total combined assessment for the subject of \$341,839. The subject's assessment reflects a market value of \$3,418,390 land included, when using the level of assessments for class 2 property of 10% 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 based on ten sales within the subject's condominium, including sales of four subject parcels that were also reported by the appellant. The sales occurred from November 2020 to April 2022 for prices ranging from \$6,698 to \$509,238 with an aggregate sale price of \$2,338,395. These properties have a combined interest of 55.98% in the common elements of the condominium. The board of review computed a value for the condominium of \$4,177,197, which would result in a combined value for the subject parcels of \$3,511,352 based on their 84.06% interest. Based on this evidence 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.

Both parties presented sales analyses of comparable sales within the subject's condominium, including sales of four or five of the subject parcels. The Board gave less weight to the appellant's sales analysis as the appellant deducted 10% for personal property, which the Board finds was not supported by any evidence in the record. Moreover, the appellant reported the sale prices for four sales included only one parcel but presented copies of deeds for those sales that

indicate the sales included two parcels, resulting in erroneous calculations of the combined interests of the properties that sold and the value of the total condominium.

The Board finds the best evidence of market value to be the sales analysis presented by the board of review, which the Board finds more accurately reported the sale prices for the sales within the subject's condominium. The subject's combined assessment reflects a market value of \$3,418,390 land included, which falls below the value of the subject parcels indicated by the board of review's sales analysis of \$3,511,352. Based on this record 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

3414-18 N. Sheffield Condominium Assoc, 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