



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

APPELLANT: Fountain Terrace Condominium Association
DOCKET NO.: 22-48274.001-R-1 through 22-48274.023-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Fountain Terrace 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
22-48274.001-R-1	10-28-105-063-1001	1,016	12,575	\$13,591
22-48274.002-R-1	10-28-105-063-1002	1,016	12,575	\$13,591
22-48274.003-R-1	10-28-105-063-1003	1,016	12,575	\$13,591
22-48274.004-R-1	10-28-105-063-1004	1,016	12,575	\$13,591
22-48274.005-R-1	10-28-105-063-1005	1,386	17,148	\$18,534
22-48274.006-R-1	10-28-105-063-1006	1,386	17,148	\$18,534
22-48274.007-R-1	10-28-105-063-1007	1,386	17,148	\$18,534
22-48274.008-R-1	10-28-105-063-1008	1,386	17,148	\$18,534
22-48274.009-R-1	10-28-105-063-1009	1,417	17,529	\$18,946
22-48274.010-R-1	10-28-105-063-1010	1,417	17,529	\$18,946
22-48274.011-R-1	10-28-105-063-1011	1,417	17,529	\$18,946
22-48274.012-R-1	10-28-105-063-1012	1,417	17,529	\$18,946
22-48274.013-R-1	10-28-105-063-1013	893	11,051	\$11,944
22-48274.014-R-1	10-28-105-063-1014	893	11,051	\$11,944
22-48274.015-R-1	10-28-105-063-1015	893	11,051	\$11,944
22-48274.016-R-1	10-28-105-063-1016	893	11,051	\$11,944
22-48274.017-R-1	10-28-105-063-1017	1,725	21,340	\$23,065
22-48274.018-R-1	10-28-105-063-1018	1,725	21,340	\$23,065
22-48274.019-R-1	10-28-105-063-1019	1,725	21,340	\$23,065
22-48274.020-R-1	10-28-105-063-1020	1,725	21,340	\$23,065
22-48274.021-R-1	10-28-105-063-1021	985	12,194	\$13,179
22-48274.022-R-1	10-28-105-063-1022	1,355	16,767	\$18,122
22-48274.023-R-1	10-28-105-063-1023	1,355	16,767	\$18,122

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 23 residential condominium units located in a 24-unit condominium building that is approximately 52 years old. The residential units on appeal have a combined 95.60% ownership interest in the condominium. The condominium has a 23,700 square foot site and is located in Skokie, Niles 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's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing two of the 23 subject parcels sold. The appellant submitted documentation disclosing subject PIN 1006 sold in March 2020 for a price of \$155,000 and PIN 1016 sold in March 2022 for a price of \$144,000, or a combined sale price of \$299,000. The appellant reported the combined ownership interest for the two sales of 7.40%. Based on these two sales, the appellant estimated market value of the 24-unit building of \$4,040,541 ($\$299,000 \div 7.40\%$). The appellant submitted a chart which allocates the total market value to each of the subject 23 parcels based on the ownership percentage for each parcel. The appellant deducted 10% for "personalty" for each of the 23 parcels and concluded a total assessment for the subjects 23 parcels based on an adjusted market value of \$347,648 when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The appellant's concluded total assessment for the subject's 23 parcels reflects a market value for the parcels on appeal of \$3,476,480.

Based on the foregoing, the appellant requested reductions be issued for the 23 residential parcels on appeal.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the 23 subject parcels of \$393,743. The subject's assessment reflects a market value of \$3,937,430, 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 Lilybeth Kafka in which four sales of parcels in the condominium were presented, two of which were presented by the appellant. The board of review's additional two sales occurred in May and December 2021 for prices of \$155,000 and \$228,000. The board of review's four comparable sales have an aggregate sale price of \$677,000 and a combined ownership interest in the units sold of 14.80% resulting in a conclusion of the full value of the condominium of \$4,574,324. Applying the ownership percentage of the units under appeal of 95.60% results in a market value for the 23 units of \$4,373,054 and a total assessment for the subject of \$437,305, 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.

The board of review's documentation included comments arguing that no PTAX-203 Real Estate Transfer Declarations were submitted by the appellant in support of the personal property deduction. The board of review also argued the appellant omitted sales of units in the subject's condominium. 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 that was applied to the sales presented by the appellant. The Board further finds nothing in the record supports a "personalty" adjustment, furthermore, no PTAX-203 was submitted to support a deduction for personal property. The Board also finds an attorney cannot act as both an advocate for a client and 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 record contains two condominium analyses for the Board's consideration. The appellant's analysis includes two sales of units in the subject's condominium while the board of review utilizes four market value sales, including the two sales submitted by the appellant. The Board finds the appellant failed to include two relevant 2021 sales of parcels in the subject's condominium and included in the appeal in its analysis. As a result, the Board gives little weight to the appellant's analysis of market value.

The Board finds the best sales in the record from the subject's condominium consist of the four sales included in the board of review's condominium analysis which results in a total value of \$4,373,054 or a total assessment of \$437,305, for the 23 parcels on appeal which falls above the 2022 total assessment for the 23 units on appeal of \$393,743.

Moreover, the record contains evidence documenting the sale of four parcels in the subject's condominium. These four parcels have a combined sale price of \$677,000 which implies a total assessment of \$67,700 at the 10% ordinance level. These same four properties have a 2022 total combined assessment of \$60,962, reflecting a market value of \$609,620. Comparing the 2022 actual assessment levels with the implied assessment levels based on sale price suggests these parcels, in aggregate, are underassessed which undermines the appellant's overvaluation argument. Therefore, based on this record, the Board finds no reduction in the subject's assessment is warranted.

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: _____

November 25, 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

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