



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

APPELLANT: Erik Anderson
DOCKET NO.: 22-53054.001-R-1
PARCEL NO.: 17-09-463-008-1050

The parties of record before the Property Tax Appeal Board are Erik Anderson, the appellant, by attorney Michael Elliott of Elliott & Associates Attorneys, PLLC in Des Plaines; 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: \$4,587
IMPR.: \$11,913
TOTAL: \$16,500

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 residential condominium unit that has .8800% ownership interest in the residential condominium property consisting of a 20 story building containing 106 residential units.¹ The condominium was built in 1929 and is approximately 93 years old. The condominium unit is located on the sixth floor and consists of 670 square feet of living area and features one bedroom and one bathroom. The property is located in Chicago, South Chicago 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 submitted evidence disclosing the subject property was purchased on November 2, 2021 for a

¹ The subject's ownership interest is found in the evidence provided by the board of review. Additional descriptive details of the subject are found in the MLS listing information printout and appraisal provided by the appellant.

price of \$165,000. The appellant indicated the subject property was purchased from Kasimir Kober, the parties to the transaction were not related, the property was sold through a realtor and had been advertised for sale in the Multiple Listing Service (MLS) for approximately 141 days. To document the sale the appellant provided a copy of the ALTA Settlement Statement and the MLS listing information printout. The settlement statement depicted the names of the sellers as Kasimir and Anita Kober and reiterated the sale date and purchase price and further depicted that commissions were paid to two realty agencies.

In further support of the overvaluation argument the appellant submitted an appraisal estimating the subject property had a market value of \$165,000 as of October 6, 2021. The appraisal was prepared by Ernest Kilgallon Jr., a State of Illinois Certified Residential Real Estate Appraiser. The appraisal was prepared for a purchase transaction for the client Wells Fargo. The appraiser noted the subject was under contract as of October 3, 2021 for a price of \$165,000.

Under the sales comparison approach to value the appraiser analyzed three comparable sales that are located within .71 of a mile from the subject property. The comparables are improved with residential condominium units located either on the sixth or ninth floor of the condominium property. The condominium units range in size from 560 to 600 square feet of living area and are from 19 to 109 years old. Each comparable has central air conditioning, one bedroom and one bathroom. The properties sold from March to September 2021 for prices ranging from \$160,000 to \$196,000 or from \$276.82 to \$350.00 per square foot of living area, including land. The appraiser adjusted comparables #1 and #3 for sales or financing concessions and also adjusted the comparables for differences in view, overall condition/interior upgrades, gross living area and quality of the kitchen and bathrooms. The adjusted prices ranged from \$161,800 to \$170,000. Using this data, the appraiser arrived at an estimated market value for the subject of \$165,000 as of October 6, 2021.

The appellant also submitted a brief arguing that a 9.16% three-year median level of assessment should be applied. In support of this argument, the appellant enclosed a press release regarding the 2022 Cook County Final Multiplier announced by the Illinois Department of Revenue.

Based on this evidence, the appellant requested a reduced assessment of \$15,114, based on the \$165,000 purchase price multiplied by the purported 2022 three-year median level of assessment for class 2 property of 9.16%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$19,948. The subject's assessment reflects a market value of \$199,480, 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 prepared by Lilybeth Kafka, an analyst with the Cook County Board of Review. The analyst provided data on 24 sales of residential units in the subject's condominium property, which included the sale of the subject property. The sales occurred from January 2019 to December 2022. The analyst reported a total consideration for these 24 sales of \$5,332,900. The total consideration was divided by the percentage of interest of ownership in the condominium property for the residential units that sold of 22.7700% to arrive at an indicated full value for the

condominium property of \$23,420,729 and an assessment of \$2,342,073, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this evidence the board of review requested confirmation of the subject's assessment.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

As an initial matter, the Board gives no weight to the appellant's median level of assessment argument as the appellant submitted insufficient evidence to support the application of this level of assessment.

The appellant submitted evidence of the 2021 sale of the subject property and the board of review submitted a condominium analysis to support their respective positions before the Board.

The Board finds the best evidence of market value to be the purchase of the subject property on November 2, 2021 for a price of \$165,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a realtor and the property had been advertised for sale. In further support of the transaction, the appellant submitted copies of the settlement statement, the MLS listing and an appraisal associated with the purchase of the subject property. The Board finds the board of review did not present any substantive evidence to challenge the arm's length nature of the subject's sale transaction. In addition, the assessing officials did not refute the contention that the purchase price was reflective of market value. Moreover, the board of review's analyst included the subject's purchase price in the condominium analysis. The Board finds the purchase price of \$165,000 is below the market value of \$199,480 as reflected by the assessment. Furthermore, the Board has given less weight to the estimated market value of the entire condominium complex as indicated in the board of review condominium analysis, as the Board finds that 10 of the 24 sales chosen by the board of review analyst occurred in 2019 and 2020 which are less proximate in time to the lien date at issue than the remaining sales in the analysis, including the sale of the subject property, and thus are less likely to be indicative of market value as of the January 1, 2022 assessment date. Based on this record the Board finds the subject property had a market value of \$165,000 as of January 1, 2022. Since market value has been determined the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. 86 Ill.Admin.Code §1910.50(c)(2).

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

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: July 15, 2025

Clerk of the Property Tax Appeal Board

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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