FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: 1536 W. Walton Condo Assn.
DOCKET NO.: 22-59280.001-R-1 through 22-59280.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 1536 W. Walton Condo Assn., the appellant(s), by attorney Max E. Callahan, of Siegel & Callahan, P.C. 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
22-59280.001-R-1	17-05-314-065-1001	4,008	63,636	$67,644
22-59280.002-R-1	17-05-314-065-1002	2,977	47,540	$50,517
22-59280.003-R-1	17-05-314-065-1003	3,620	57,719	$61,339

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed a direct appeal pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) challenging the assessment for the 2022 tax year, after receiving a reduction through a stipulation in assessment for the same property in case 21-38284.001-R-1. 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 an approximately eight-year-old condominium with three units. The property has approximately 5,550 square feet of living area. Features of the home include a masonry exterior, a full basement and central air conditioning. The property is located in Chicago, West 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 contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted a prior Board decision from 2021 granting a reduction in assessment for the property. The appellant disclosed that the property consists of owner-occupied residences during the subject lien year. Additionally, the appellant submitted sales information of a comparable property with three units. They sold from August 2020 to December 2020 for prices ranging from $240.33 to $336.99 per square foot of living area, including land. The appellant contends that the Assessor did not provide credit for the sale of personal property in each of the units and estimates the sale of personal property to be $269,250 for the entire building. Based on this evidence, the appellant requested a reduction in the subject's total assessment to $152,575.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $179,500. The subject's assessment reflects a market value of $1,795,000 or $323.42 per square foot of living area, 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 2025 condominium analysis using a sale for unit one for an aggregate price of $2,231,314. The board of review disclosed that unit one sold in May 2022 for $818,000. The board of review disclosed that unit one has an ownership interest of 36.66% in the building, unit two has an ownership interest of 27.23% in the building and unit three has an ownership interest of 33.11% in the building. Based on this analysis, the board of review requested confirmation of the subject's current 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Property Tax Appeal Board finds that the assessment as established by the Board for the 2021 tax year should not be carried forward to the tax year at issue as provided by section 16-185 of the Property Tax Code.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) states in part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review. 35 ILCS 200/16-185.

The Board takes official notice that under 21-38284.001-R-1 it rendered a decision lowering the subject's assessment for tax year 2021 (86 Ill.Admin.Code §1910.90(i)) for unit one of the subject property only. In that decision, the assessments for units two and three were unchanged. Therefore, units two and three would not qualify for a rollover under the statute. Additionally, the Board finds that unit one was sold in May 2022 establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment was based for 2021. Therefore, unit one does not qualify for a rollover under the statute.

As to the appellant's argument on overvaluation, the Board finds the best evidence of market value to be the May 2022 sale of unit one for $818,000. This recent sale within the building and the board of review's condominium market analysis shows the building to have an overall market value of $2,231,314, which is higher than the actual assessed value. The appellant did not specify the items of personal property allegedly involved in the sales, nor did it address the factors used by Illinois courts to determine whether property is real or personal. See A & A Market v. Pekin Ins. Co., 306 Ill. App. 3d 485, 488 (3d Dist. 1999). Therefore, appellant failed to show that there should be a reduction for personal property. Appellant failed to show overvaluation by a preponderance of the evidence, so an assessment reduction of that basis is not 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:

C E R T I F I C A T I O N

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: September 15, 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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