FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Tami Stieber
DOCKET NO.: 23-29355.001-R-1
PARCEL NO.: 14-16-301-041-1218

The parties of record before the Property Tax Appeal Board are Tami Stieber, the appellant(s), by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, 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:

LAND:	$1,271
IMPR.:	$17,428
TOTAL:	$18,699

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 2023 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 is a condominium unit in an approximately 55-year-old, 873-unit residential condominium building that is located on a 132,634 square foot site in Chicago, Lake View Township, Cook County. The subject unit has a 0.1160% ownership interest in the common elements of its building. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance. The record disclosed that the subject property was owner-occupied during the lien year.

In support of the overvaluation argument, the appellant submitted an appraisal estimating the subject property had a market value of $92,000 as of January 1, 2021. The appraiser utilized the sales comparison approach in their evaluation. For the sales comparison approach, the appraiser used sales of five comparable properties in different buildings in Chicago, IL that took place December 2019 for amounts ranging from $91,000 to $95,000, or from $106.94 to $115.84 per

square foot of living area, land included in the sales prices. The appraiser adjusted the sales prices to account for differences between the subject and the comparables. Photographs of the subject dwelling's exterior and interior were included with the appraisal. The appellant also submitted a copy of the board of review's decision letter reflecting its total assessment valuation for the subject property of $18,699. Based on this evidence, the appellant requested a reduction in the subject's assessment to $9,200

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject as $18,699. In support of its contention of the correct assessment, the board of review submitted its Condominium Analysis for 2023, which is based upon sales of 184 other units in the subject's building. The total consideration for the 184 sales was $36,799,909, and the 184 units represented a combined 21.9850% ownership interest in the common element. This translated to a value for the entire building of $167,386,441. Multiplying the market value of the building by the subject unit's ownership interest of 0.1160% amounted to a fair market value for the subject unit of $194,168. This reflects an assessed value of $19,417, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

This matter was set to proceed to hearing. Prior to hearing, the parties submitted a written request to waive hearing and for this matter to be written on the evidence previously submitted. The administrative law judge granted the parties' request.

Conclusion of Law

The taxpayer contends overevaluation as the basis of the appeal. The taxpayer asserts that the market value of the subject property is not accurately reflected in its assessed valuation. When overvaluation is claimed, the appellant has the burden of proving the value of the property by a preponderance of the evidence. Cook Cnty. Bd. of Review v. Prop. Tax Appeal Bd., 339 Ill. App. 3d 529, 545 (1st Dist. 2002); National City Bank of Michigan/Illinois v. Prop. Tax Appeal Bd., 331 Ill. App. 3d 1038, 1042 (3d Dist. 2002) (citing Winnebago Cnty. Bd. of Review v. Prop. Tax Appeal Bd., 313 Ill. App. 3d 179 (2d Dist. 2000)); 86 Ill. Admin. Code § 1910.63(e). Proof of market value may consist of an appraisal, a recent arm's length sale of the subject property, recent sales of comparable properties, or recent construction costs of the subject property. Calumet Transfer, LLC v. Prop. Tax Appeal Bd., 401 Ill. App. 3d 652, 655 (1st Dist. 2010); 86 Ill. Admin. Code § 1910.65(c). Having considered the evidence presented, the Board finds that the evidence indicates a reduction *is not* warranted.

"Real property taxes . . . which are authorized by law to be assessed against and levied upon real property shall be assessed against and levied upon each unit and the owner's corresponding percentage of ownership in the common elements as a tract, and not upon the property as a whole." 765 ILCS 605/10(a).

The Board concludes that the best evidence of the subject's market value is the Condominium Analysis for 2023 submitted by the board of review utilizing sales of 184 comparable units, including the subject unit. Each of these was a sale of a condominium unit in the same building as appellant's unit. In its determination of the proper assessment, the board of review added the total compensation from these 184 sales together, and the total was $36,799,909. The board of

review also determined that the 184 condominium units together constitute a 21.9850% interest in the common elements of the building and calculated the full value of the building as $167,386,441. That analysis used data from 184 recent sales of other units in the subject unit's building including the sale of the subject unit to derive at a fair market value for the entire building and the subject unit. The board of review then multiplied this figure by the subject unit's 0.1160% interest in the building as a whole and determined that the subject unit should be assessed at $19,417, reflecting a market value of $194,168, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The appraisal report reflects comparables sales from other buildings without adjustments for differences in ownership percentages, common elements, and amenities of the other buildings. The Board finds the stronger evidence of fair market value is the sales provided by the board of review in the actual subject property's building. The subject property's current valuation assessment reflects a market value above the market value reflected by the best evidence in this appeal. The Board therefore finds that appellant failed to meet the requisite burden of proof, and a reduction in the subject's assessment 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: November 17, 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 9-215 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

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