



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

APPELLANT: Kurt Schlueter
DOCKET NO.: 23-34788.001-R-1 through 23-34788.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Kurt Schlueter, 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
23-34788.001-R-1	16-13-411-067-1001	1,773	23,982	\$25,755
23-34788.002-R-1	16-13-411-067-1002	1,240	16,783	\$18,023

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 consists of two condominium units within a 4-story 12-unit building of masonry exterior construction. The building is approximately 16 years old. The units have a combined dwelling size of 3,000 square feet and a combined 17.95% ownership interest in the condominium, with Unit #1 having a 10.56% interest and Unit #2 having a 7.39% interest. Features of the units include central air conditioning, a fireplace, and a 1-car garage. The property has a 7,996 square foot site and 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's appeal is based on overvaluation. In support of this argument the appellant submitted information on five comparable sales located within the subject's assessment neighborhood and within .7 of a mile of the subject. The comparables consist of 3-story or 4-

story class 2-99 condominium buildings of masonry exterior construction. The units range in size from 1,100 to 1,540 square feet of living area. The buildings range in age from 16 to 100 years old. Each building has central air conditioning and two comparables each have a fireplace. The parcels range in size from 1,563 to 3,125 square feet of land area. The comparables sold from February 2022 to September 2023 for prices ranging from \$202,000 to \$225,000 or from \$141.56 to \$195.45 per square foot of gross building area, including land. Based on this evidence, the appellant requested a reduced assessment of either \$21,799 or \$21,800 for each unit, for estimated market values of \$217,990 and \$218,000 when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the board of review final decision disclosing the combined total assessment for the subject of \$43,778. Unit #1 has a total assessment of \$25,755 and Unit #2 has a total assessment of \$18,023, for estimated market values of \$257,550 and \$180,230, respectively, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a document entitled Condominium Analysis Results for 2023, which was based on the sales of three units within the subject building, including one of the units under appeal, to estimate the value of the condominium under appeal. The board of review arrived at a total consideration for the three sales of \$620,900. The board of review analysis indicated these properties had a combined 22.68% ownership interest in the condominium. Dividing the total consideration by the percentage of ownership in the condominium resulted in a full value of the condominium building of \$2,737,654. Multiplying the full value of the condominium building by the percentage ownership of the units under appeal results in a market value for Unit #1 of \$289,096 and a market value for Unit #2 of \$202,313. 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board gives less weight to the appellant's sales, which differ from the subject in dwelling size. The Board finds the best evidence of market value to be the sales presented by the board of review. These sales reflect a total consideration of \$620,900 and using the combined percentage interest of ownership in the units that sold of 22.68%, the calculation indicates a full value for the condominium property of \$2,737,654. Next, the Board finds that applying the subject units' percentage ownership interest in the condominium property of 10.56% and 7.39% to the entire building value results in a market value calculation for Unit #1 of \$289,096 and a market value for Unit #2 of \$202,313, which are greater than the units' estimated market values as reflected by

their assessments of \$257,550 and \$180,230. Further, the record revealed that Unit #2 sold in April 2022 for a price of \$231,000, undermining the appellant's argument for a reduced assessment. Based on this evidence, the Board finds no change in the subject's assessment is 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: _____

October 20, 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

AGENCY

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Kurt Schlueter, by attorney:
Michael R. O'Malley
Schmidt Salzman & Moran, Ltd.
111 West Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602