



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

APPELLANT: Alfred Altschul
DOCKET NO.: 23-39891.001-R-1
PARCEL NO.: 17-03-108-017-1331

The parties of record before the Property Tax Appeal Board are Alfred Altschul, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, 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 **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: \$6,477
IMPR.: \$72,570
TOTAL: \$79,047

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 a residential condominium unit with 2,250 square feet of living area located on the 27th floor of a building of masonry exterior construction that is approximately 49 years old. Features include two bedrooms, three full bathrooms, electric space heating/cooling and a fireplace. The subject has a 1.3820% interest the common elements of the condominium. The property has an 18,412 square foot site and is located in Chicago, North 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 an appraisal estimating the subject property had a market value of \$755,000 as of January 1, 2022. The appellant disclosed in the appeal petition that the subject is an owner-occupied residence. The Board takes judicial notice that the subject was the subject matter of an

appeal before the Board the prior tax year as Docket No. 22-50361 in which the Board issued a decision lowering the subject's assessment to \$79,047 based on the evidence submitted by the parties. Based on this evidence the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$82,091. The subject's assessment reflects a market value of \$820,910, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The board of review did not report any equalization factor for North Chicago Township in 2023.

In support of its contention of the correct assessment the board of review submitted a sales analysis based on 46 sales in the subject's condominium, including appraisal sale #6.¹ The sales have an aggregate price of \$15,680,504 and a combined interest of 21.0524% in the common elements of the condominium. The board of review concluded a value for the condominium of \$74,483,213, which would indicate a value for the subject of \$1,029,358 based on its 1.3820% interest. The board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant argued an appeal before the Board is pending for the 2021 tax year, and if a reduction is granted, it should be carried forward to the 2022 tax year within the same general assessment period under Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) as the subject is an owner-occupied residence.

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, pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) a reduction in the subject's assessment is warranted. In pertinent part, section 16-185 of the Property Tax Code provides:

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.

¹ The board of review reported this property has a combined 1.3898% interest in the common elements of the condominium, which is the most similar to the subject in percentage of ownership of all the sales reported by the board of review.

The Board finds that the subject property was the subject matter of an appeal before the Board for the 2022 tax year under Docket No. 22-50361 in which a decision was issued based upon the evidence presented by the parties reducing the subject's assessment to \$79,047. The record further disclosed the subject property is an owner-occupied dwelling. The Board also finds that the 2022 and 2023 tax years are within the same general assessment period and no equalization factor was applied in North Chicago Township in 2023. Furthermore, the decision of the Board for the 2022 tax year has not yet been reversed or modified upon review and there was no evidence the subject property recently sold establishing a different fair cash value. Applying section 16-185 of the Property Tax Code would result in a reduced total assessment of \$79,047, which is less than the 2023 assessment of the subject property of \$82,091.

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: _____

September 16, 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

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