



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

APPELLANT: Joe & Norma Nelson  
DOCKET NO.: 23-40282.001-R-1  
PARCEL NO.: 14-29-124-047-1001

The parties of record before the Property Tax Appeal Board are Joe & Norma Nelson, the appellant(s); 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:** \$11,250  
**IMPR.:** \$14,250  
**TOTAL:** \$25,500

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 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 condominium unit with 24% interest in the building located within a 30-year-old, masonry, multi-story, three-unit condominium building. The property is located in Chicago, Lakeview Township, Cook County and is classified as a class 2-99 property under the Cook County Real Property Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal which estimated the subject's market value as of January 1, 2022, of \$255,000. The appraiser utilized the sales comparison approach to value to estimate the subject's market value and disclosed an inspection date of August 23, 2022. The appraiser analyzed six two-bedroom comparables. The appraisal explained the adjustments made to the comparables for pertinent factors. After making these adjustments, the appraiser estimated a value for the subject of \$255,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the assessment of \$36,999 which reflects a market value of \$369,990 using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of the current assessment, the board of review listed the assessment and percentage of ownership for all the units within the building. The board of review also listed sale prices for each unit with no sale dates.

In rebuttal, the appellant submitted a letter arguing that the board of review's evidence does not provide sale dates. He asserts the board of review did not submit actual evidence to support these market prices. He asserted that there are no adjustments made to the board of review's evidence and that his evidence is the best as it includes an appraisal with adjustments.

At hearing, the appellant, Joe Nelson, testified that he purchased the subject in 1994 and it has remained in the same condition since the purchase. He testified that he has done no upgrades to the unit. Mr. Nelson then called his witness.

The appraiser, Mike Illingworth, testified that he has been an appraiser since 1992 and that he has written approximately 11,000 in his career. He testified he utilized six comparables for added support. Illingworth testified that he reviewed sales of comparables that were similar in age and characteristics and followed appraiser practice in comparing those properties to the subject. He testified that he had another appraiser look at his work. Under cross examination, Illingworth testified that he made his adjustments based on the market and with input from local realtors. He opined that the realtors are most attuned to the neighborhoods. He reiterated that he speaks with local market participants.

The board of review's representative, Rachel Dickerson, rested on the evidence previously submitted. On cross examination, she testified that in general the board of review tries not to make too many adjustments. Mr. Nelson argued that the sale price from one unit does not include any supporting documents and that the board of review just used the percentage of ownership to value the remaining units. He argued that his appraiser made adjustments and went through a process to find the value.

### **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 best evidence of market value to be the appraisal submitted by the appellant. The appellant's appraiser utilized the sales comparison approach to value in determining the subject's market value. The current assessment reflects a market value above this value. The Board finds this appraisal to be persuasive because the appraisal discloses that the appraiser inspected the subject, reviewed the property's history, and used similar properties in the sales comparison approach. Therefore, the Board finds the subject property's market value of

\$255,000 as of the assessment date at issue. Since market value has been established the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10% shall apply.

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: \_\_\_\_\_

August 19, 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

AGENCY

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

APPELLANT

Joe & Norma Nelson  
1924 Spruce Circle  
Munster, IN 46321

COUNTY

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