FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Stacie Hess
DOCKET NO.: 23-53623.001-R-1 through 23-53623.032-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Stacie Hess, the appellant(s), by attorney Michael R. O'Malley, 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
23-53623.001-R-1	24-18-101-115-1001	936	14,063	$14,999
23-53623.002-R-1	24-18-101-115-1002	936	14,063	$14,999
23-53623.003-R-1	24-18-101-115-1003	936	14,063	$14,999
23-53623.004-R-1	24-18-101-115-1004	936	14,063	$14,999
23-53623.005-R-1	24-18-101-115-1005	936	14,063	$14,999
23-53623.006-R-1	24-18-101-115-1006	936	14,063	$14,999
23-53623.007-R-1	24-18-101-115-1007	936	14,063	$14,999
23-53623.008-R-1	24-18-101-115-1008	936	14,063	$14,999
23-53623.009-R-1	24-18-101-115-1009	936	14,063	$14,999
23-53623.010-R-1	24-18-101-115-1010	936	14,063	$14,999
23-53623.011-R-1	24-18-101-115-1011	936	14,063	$14,999
23-53623.012-R-1	24-18-101-115-1012	936	14,063	$14,999
23-53623.013-R-1	24-18-101-115-1013	936	14,063	$14,999
23-53623.014-R-1	24-18-101-115-1014	936	14,063	$14,999
23-53623.015-R-1	24-18-101-115-1015	936	14,063	$14,999
23-53623.016-R-1	24-18-101-115-1016	936	14,063	$14,999
23-53623.017-R-1	24-18-101-115-1017	936	14,063	$14,999
23-53623.018-R-1	24-18-101-115-1018	936	14,063	$14,999
23-53623.019-R-1	24-18-101-115-1019	936	14,063	$14,999
23-53623.020-R-1	24-18-101-115-1020	936	14,063	$14,999
23-53623.021-R-1	24-18-101-115-1021	936	14,063	$14,999
23-53623.022-R-1	24-18-101-115-1022	936	14,063	$14,999
23-53623.023-R-1	24-18-101-115-1023	936	14,063	$14,999
23-53623.024-R-1	24-18-101-115-1024	936	14,063	$14,999
23-53623.025-R-1	24-18-101-115-1025	936	14,063	$14,999

23-53623.026-R-1	24-18-101-115-1026	936	14,063	$14,999
23-53623.027-R-1	24-18-101-115-1027	936	14,063	$14,999
23-53623.028-R-1	24-18-101-115-1028	936	14,063	$14,999
23-53623.029-R-1	24-18-101-115-1029	936	14,063	$14,999
23-53623.030-R-1	24-18-101-115-1030	936	14,063	$14,999
23-53623.031-R-1	24-18-101-115-1031	936	14,063	$14,999
23-53623.032-R-1	24-18-101-115-1032	936	14,063	$14,999

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 13-year old, 32-unit residential condominium building that is located on a 52,109 square foot site in Chicago Ridge, Worth Township, Cook County. 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.

The appellant asserts overvaluation as the basis for the appeal. In support of this argument, the appellant submitted information on eight sales comparable properties with varying degrees of similarity to the subject. The appellant reported that the suggested comparable properties were located within the same building as the subject. The suggested comparable properties were all class 2-99 properties, 13-year-old dwellings of brick construction. The comparable properties ranged: in price between $94,000 to $600,000; 1,300 square feet of living are; and in sale price per square foot between $72.31 to $461.54, including land. Based on this evidence, the appellant requested a reduction in the subject's total assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject as $479,968 which reflects a market value of $4,799,680 when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. 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 11 units in the subject’s building. The total consideration for the 11 sales was $1,640,004, and the 11 units represented a 34.3750% ownership interest in the common element. This translated to a value for the entire building of $4,770,920, which amounted to a fair market value for the subject building of $4,770,920. This reflects an assessed value of $477,092 when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

Conclusion of Law

The taxpayer contends overvaluation as the basis of the appeal. 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). 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). Having considered the evidence presented, the Board finds that the evidence indicates a reduction is not warranted.

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 11 comparable units and the appellant's eight suggested comparable sales. The Board finds both parties shared seven of the comparables in their submitted evidence and all of these were sales of a condominium unit in the same subject building. Therefore, the Board finds that appellant failed to meet the requisite burden of proof for overvaluation, 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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