



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

APPELLANT: Joe & Norma Nelson
DOCKET NO.: 24-36448.001-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: \$13,950
IMPR.: \$13,550
TOTAL: \$27,500

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 2024 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 a 24% ownership interest in a building with three units. The dwelling is approximately thirty years old. The property has 907 square feet of living area and is located in Chicago, Lakeview Township, Cook County. The property is 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 \$275,000 as of January 1, 2024. The appraiser utilized the sales comparison approach to value the subject's market value and indicated an inspection date of July 7, 2024. The appraiser analyzed four comparable sales located within 1.6 miles of the subject property. The comparable properties ranged in size from 865 to 1,150 square feet of living area. These comparable properties sold from February 2023 to October 2023 for prices ranging from \$247,500 to

\$282,500. The appraiser then adjusted for age, modernization and quality/construction. The appraiser concluded that based on the sales data and applying adjustments to the comparable sales for differences from the subject, the subject had a market value of \$275,000 or \$303.19 per square foot of living area, land included. The petition disclosed the subject is not an owner-occupied residence.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$35,615.¹ The subject's assessment reflects a market value of \$356,150 or \$392.67 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a 2024 condominium analysis using three sales with no sales information for an aggregate price of \$1,483,999. The analysis listed the percentage of ownership for all units within the subject building. Based on this analysis, the board of review requested confirmation of the subject's current assessment.

In rebuttal, the appellant submitted a letter arguing that the board of review's evidence used an anonymous sale that is not comparable to the subject property.

At hearing, the appellant called its first witness, an appraiser, Mike Illingworth, who testified that he has been a licensed appraiser since 1992 and has completed over 11,000 appraisals in his career. He was accepted as an expert in the field of appraising residential property. He testified that he looked for similar comparables to the subject unit and made adjustments for differences in financing, location, and time of sale.

Under cross examination, Mr. Illingworth testified about the location of the four comparables he used. He indicated that comparable three was over a mile away from the subject property and that comparable four was 1.6 miles away from the subject property. Mr. Illingworth stated that comparables a mile away can still be in a comparable market area. He testified that he determined the property had 907 square feet of living area by using a laser measure. He testified that he does not recall exactly where he got the square footage of the four comparables, but that he often uses information from multiple listing sheets.

The board of review presented its Notes on Appeal and condominium analysis as part of its case. The board of review representative, John Lartz, testified to the information contained on the condominium analysis but he explained it did not contain specific information on the sales used and that no adjustments were made to the sales prices.

The appellant then argued that the submitted appraisal should be used to determine the fair market value of the subject property because it was done by an independent third party who was licensed and qualified to give an opinion on market value and that the appraiser made

¹ The Board of Review Notes on Appeal indicate a total assessment of \$36,999; however, the appellant submitted a board of review decision letter indicating the total assessment was \$35,615. The Board finds \$35,615 to be the correct total assessment for the property.

adjustments to the comparable sales that were used. The board of review argued that the appraisal did not contain certain net and gross sales adjustments that were necessary.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appellant submitted a credible appraisal of the subject property prepared by a certified general real estate appraiser who made adjustments based on differences between the subject property and the selected comparable properties. The subject's assessment reflects a market value of \$356,150 or \$392.67 per square foot of living area, which is above the appraised value. The Board finds the subject property had a market value of \$275,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance 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: June 16, 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 9-125 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

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