



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

APPELLANT: 3114-3116 W Irving Park Condominim Assoc
DOCKET NO.: 24-47222.001-R-1 through 24-47222.006-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 3114-3116 W Irving Park Condominim Assoc, 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
24-47222.001-R-1	13-13-325-039-1003	5,032	25,013	\$30,045
24-47222.002-R-1	13-13-325-039-1004	5,032	25,013	\$30,045
24-47222.003-R-1	13-13-325-039-1005	5,188	25,789	\$30,977
24-47222.004-R-1	13-13-325-039-1006	5,188	25,789	\$30,977
24-47222.005-R-1	13-13-325-039-1007	5,344	26,565	\$31,909
24-47222.006-R-1	13-13-325-039-1008	5,344	26,565	\$31,909

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant filed a timely 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 property is a residential condominium building that contains eight units, each designated with a Property Index Number (PIN). Six of the units comprise the subject property under appeal to the Board: PINs 1003, 1004, 1005, 1006, 1007, and 1008. The property is improved with an 82-year-old, four-story, building of masonry construction. Features of the subject include a slab foundation and central air conditioning. The property is situated on 6,292 square

feet of land in Jefferson Township, Cook County. It 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 information on three suggested comparable sales in the building: PINs 1003, 1004, and 1007. The appellant cited a total consideration of \$920,000 for these three sales. It subtracted 10.00% from this total for personal property to arrive at an adjusted total real property consideration of \$1,672,769. The appellant requests an assessment of \$167,276.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment of \$185,862 for the subject property. The subject's assessment reflects a market value of \$1,858,620 when applying the 2024 level of assessment of 10.00% 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 condominium analysis with information on suggested comparable sales for the same three units in the building, PINs 1003, 1004, and 1007, cited by the appellant as suggested comparable sale properties. These units sold from 2021 through 2022 for a total consideration of \$920,000. The units sold comprised of 39.50% the common elements of the building. The result was a full value of the property at \$2,329,113. Since the six-unit subject owned 79.80% of the common elements, the board of review suggested the market value of the subject was \$1,858,632.

The parties were in accord as to the dates and sale prices of their mutual suggested sale properties. PIN 1003 owned 12.90% of the common elements and sold for \$295,000 in 2022. PIN 1004 owned 12.90% of the common elements and sold for \$335,000 in 2021. PIN 1007 owned 13.70% of the common elements and sold for \$290,000 in 2022.

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 finds the best evidence of market value to be the board of review comparable sale(s) analysis. This and the appellant's analyses were based on the same three sales of units in the subject building. However, the Board gives minimal weight to the appellant's argument for a personal property reduction of the suggested market value because it was not supported by evidence or a basis in law.

Based on this evidence, the Board finds a reduction in the subject's assessment is not 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: _____

September 15, 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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APPELLANT

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