



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

APPELLANT: 6819-35 N. Seeley Ave Condominium Assoc
DOCKET NO.: 11-20829.001-R-3 through 11-20829.037-R-3
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 6819-35 N. Seeley Ave Condominium Assoc, the appellant(s), by attorney David C. Dunkin, of Arnstein & Lehr, LLP 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
11-20829.001-R-3	11-31-125-024-1001	1,738	1,930	\$3,668
11-20829.002-R-3	11-31-125-024-1002	1,609	1,785	\$3,394
11-20829.003-R-3	11-31-125-024-1003	1,609	1,785	\$3,394
11-20829.004-R-3	11-31-125-024-1004	1,821	2,021	\$3,842
11-20829.005-R-3	11-31-125-024-1005	1,821	2,021	\$3,842
11-20829.006-R-3	11-31-125-024-1006	1,296	1,439	\$2,735
11-20829.007-R-3	11-31-125-024-1007	1,296	1,439	\$2,735
11-20829.008-R-3	11-31-125-024-1008	1,685	1,871	\$3,556
11-20829.009-R-3	11-31-125-024-1009	1,588	1,762	\$3,350
11-20829.010-R-3	11-31-125-024-1010	1,588	1,762	\$3,350
11-20829.011-R-3	11-31-125-024-1011	1,767	1,962	\$3,729
11-20829.013-R-3	11-31-125-024-1013	1,447	1,607	\$3,054
11-20829.014-R-3	11-31-125-024-1014	1,290	1,432	\$2,722
11-20829.015-R-3	11-31-125-024-1015	1,272	1,413	\$2,685
11-20829.016-R-3	11-31-125-024-1016	1,272	1,413	\$2,685
11-20829.017-R-3	11-31-125-024-1017	1,007	1,118	\$2,125
11-20829.018-R-3	11-31-125-024-1018	1,385	1,537	\$2,922
11-20829.019-R-3	11-31-125-024-1019	1,385	1,537	\$2,922
11-20829.020-R-3	11-31-125-024-1020	1,289	1,430	\$2,719
11-20829.021-R-3	11-31-125-024-1021	1,265	1,404	\$2,669
11-20829.022-R-3	11-31-125-024-1022	1,264	1,404	\$2,668
11-20829.023-R-3	11-31-125-024-1023	1,001	1,112	\$2,113
11-20829.024-R-3	11-31-125-024-1024	1,379	1,531	\$2,910
11-20829.025-R-3	11-31-125-024-1025	1,379	1,531	\$2,910
11-20829.026-R-3	11-31-125-024-1026	1,380	1,531	\$2,911

11-20829.027-R-3	11-31-125-024-1027	1,571	1,744	\$3,315
11-20829.028-R-3	11-31-125-024-1028	1,571	1,744	\$3,315
11-20829.029-R-3	11-31-125-024-1029	1,670	1,854	\$3,524
11-20829.030-R-3	11-31-125-024-1030	1,436	1,595	\$3,031
11-20829.031-R-3	11-31-125-024-1031	1,436	1,595	\$3,031
11-20829.032-R-3	11-31-125-024-1032	1,694	1,880	\$3,574
11-20829.033-R-3	11-31-125-024-1033	1,292	1,435	\$2,727
11-20829.034-R-3	11-31-125-024-1034	1,292	1,435	\$2,727
11-20829.035-R-3	11-31-125-024-1036	1,820	2,019	\$3,839
11-20829.036-R-3	11-31-125-024-1037	1,611	1,789	\$3,400
11-20829.037-R-3	11-31-125-024-1038	1,611	1,682	\$3,293

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 2011 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 36 units in a 38-unit condominium building, or 94.177%. The building is 51 years old and is situated on a 31,179 square foot parcel located in Rogers Park Township, Cook County. It is classified as class 2-99 property under the Cook County Real Property Classification Ordinance.

The appellant, via counsel, submitted evidence before the Board arguing overvaluation based on the sale of 18 of the building's 38 units. In support of this claim, the appellant included: printouts from the assessor's website; printouts from the Cook County Recorder of Deeds website; various recorded deeds and MLS printouts; and a list of each PIN with its unit number and sale information. The evidence disclosed that the aggregate purchase price for the units sold was \$556,500. The sales occurred in 2010 and 2011 for prices ranging from \$22,000 to \$81,000. The appellant applied a \$2,000 reduction per unit for personal property, without further evidence, to arrive at an adjusted market value of \$520,500 for the 18 units sold. Based on this evidence, the appellant requested a reduction in the subject's total assessment which reflects a 10% level of assessment and a 94.177% factor for participating units.

The board of review submitted its "Board of Review-Notes on Appeal" disclosing the subject's total assessment of \$465,832 for the 38 units. The assessment reflects a total market value of \$4,658,320 for the building when applying the assessment level of 10% as established by the Cook County Real Property Classification Ordinance. The board of review also submitted a memorandum from Dan Michaelides, Cook County Board of Review Analyst. The board's analysis relied on four sales in the subject's building that occurred in 2007. Two of these four

sales had 2010 sale prices as well. Based on the evidence presented, the board of review requested confirmation of the subject's assessment.

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

The Board finds that the subject consists of 36 residential condominium units in a 38-unit building. The Board finds the best evidence of market value to be the appellant's condominium analysis that includes 18 recent sales. However, the Board does not find evidence to support a reduction in the market value of the residential units sold by any amount for personal property.

Based on evidence submitted, the Board finds that the subject property had a market value of \$1,183,841 for the 2011 assessment year. Since the market value has been determined, the assessment level of 10% as established by the Cook County Real Property Classification Ordinance shall apply. This yields an assessed value for the condominium building of \$118,384 as a whole. As the current assessed value is above this amount, this Board finds a reduction is warranted based on the sales evidence contained in the record. The reduction shall apply to each of the units in the subject in proportion to their respective percentages of ownership in the property.

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.



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: July 22, 2016



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 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 the subsequent year 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.

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.