



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

APPELLANT: Thomas Cyplik  
DOCKET NO.: 11-25616.001-R-1 through 11-25616.002-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Thomas Cyplik, the appellant(s); and the Cook County Board of Review.

Based on the facts and exhibits presented, 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:

<b>DOCKET NO</b>	<b>PARCEL NUMBER</b>	<b>LAND</b>	<b>IMPRVMT</b>	<b>TOTAL</b>
11-25616.001-R-1	24-08-412-029-1158	962	9,302	\$10,264
11-25616.002-R-1	24-08-412-029-1178	189	1,827	\$2,016

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 a residential condominium unit and a parking unit. The subject is classified as 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 sales dates and prices for 14 comparable sales that occurred from March 2010 to June 2013.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$14,414. The subject's assessment reflects a market value of \$151,886 including land, when applying the 2011 three year average median level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 9.49% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted the percentages of ownership for all of the units in the subject condominium. In addition, the board submitted a condominium sales analysis based on four sales in the subject building that occurred from 2008 through 2010. The four sales total \$541,000. Two percent for personal property was deducted, resulting in an adjusted consideration of \$530,180. This amount was then divided by the total percentage of ownership sold of 2.8217% resulting in a full market value for the condominium as a whole of \$18,789,382. This value was then multiplied by the subject's percentage of ownership, resulting in a market value for the subject of \$198,435. Based on this analysis, the board 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 not meet 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 11 sales from November 2009 through December 2012 that were submitted by both parties. These sales totaled \$1,189,900. Personal property was not deducted from this amount as neither party submitted evidence that personal property was included in the sales prices. The total sale price of \$1,189,900 was divided

by the percentage of ownership of the sold units of 9.7108%, resulting in a full market value for the condominium as a whole of \$12,253,014. This amount was then multiplied by the subject's percentage of ownership of \$1.0561, resulting in a market value for the subject of \$129,404. This amount was then multiplied by the average median level of assessment for class 2 property of 9.49%, resulting in a total assessment for the subject property of \$12,280, which is below the subject's current assessment. Based on this evidence the Board finds a reduction in the subject's assessment is 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.

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Chairman



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Member



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Member

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Member



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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: May 22, 2015



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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.