



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

APPELLANT: West Cornelia Ct Townhouse Assoc.  
DOCKET NO.: 11-27945.001-R-1 through 11-27945.006-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are West Cornelia Ct Townhouse Assoc., the appellant, by attorney Timothy E. Moran, 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 **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>
11-27945.001-R-1	13-24-304-047-0000	5,863	53,476	\$59,339
11-27945.002-R-1	13-24-304-048-0000	3,237	41,752	\$44,989
11-27945.003-R-1	13-24-304-049-0000	3,237	41,752	\$44,989
11-27945.004-R-1	13-24-304-050-0000	3,242	41,747	\$44,989
11-27945.005-R-1	13-24-304-051-0000	3,256	41,733	\$44,989
11-27945.006-R-1	13-24-304-052-0000	3,412	41,577	\$44,989

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 three-story residential townhome association of masonry construction. The two year old townhome association has six units containing 1,762 or 2,324 square feet of living area. Features of the home include a slab foundation, central air conditioning and a two-car garage. The property is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-95 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment equity as the bases of the appeal. In support of these arguments the appellant submitted a sales analysis consisting of 26 properties that sold from 2007 to 2010, purchase documents of eight properties, seven of which sold from June 2006 to March 2010 for prices ranging from \$400,000 to \$575,000 and a grid analysis with limited information on 25 purported comparable properties. The comparables had improvement assessments ranging from \$37,168 to \$70,728, however, the dwelling sizes of the comparables were not disclosed, so no improvement assessment per square foot analysis could be determined. The appellant did not contest the subject's land assessments.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for one of the townhome units from the subject of \$60,840. This unit's assessment reflects a market value of \$600,840 or \$258.54 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 information on four comparable sales that occurred from May 2008 to May 2009 for prices ranging from \$406,000 to \$598,700 or from \$230.42 to \$283.77 per square foot of living area, including land. The comparables had improvement assessments of \$20.98 or \$23.16 per square foot of living area.

### **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 appellant's two sales that occurred in March 2010 for prices of \$400,000 and \$449,900. The Board finds the parties' remaining sales occurred greater than 14 months prior to the January 1, 2011 assessment date at issue and received less weight in the Board's sales analysis. The subject's six townhome assessments reflect market values ranging from \$452,000 to \$600,840, including land, which are above the market values of the best comparable sales in this record. Based on this evidence the Board finds reductions in the subject's assessments are justified on overvaluation grounds.

As to the appellant's assessment equity argument, the Board finds that a further reduction based on equity is not warranted. The subject's improvement assessments, after the reduction due to overvaluation, range from \$23.01 to \$23.70 per square foot of living area. The board of review comparables had improvement assessments of \$20.98 or \$23.16 per square foot of living area, which would reflect assessment uniformity.

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



Acting 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: November 23, 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.