



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

APPELLANT: South Pointe Condo of Tinley Park
DOCKET NO.: 11-31837.001-R-1 through 11-31837.057-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are South Pointe Condo of Tinley Park, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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
11-31837.001-R-1	31-06-210-050-1001	1,848	9,021	\$10,869
11-31837.002-R-1	31-06-210-050-1002	1,848	9,021	\$10,869
11-31837.003-R-1	31-06-210-050-1003	1,848	9,021	\$10,869
11-31837.004-R-1	31-06-210-050-1004	1,848	9,021	\$10,869
11-31837.005-R-1	31-06-210-050-1005	1,848	9,021	\$10,869
11-31837.006-R-1	31-06-210-050-1006	1,848	9,021	\$10,869
11-31837.007-R-1	31-06-210-050-1007	1,848	9,021	\$10,869
11-31837.008-R-1	31-06-210-050-1008	1,848	9,021	\$10,869
11-31837.009-R-1	31-06-210-050-1009	1,848	9,021	\$10,869
11-31837.010-R-1	31-06-210-050-1010	1,848	9,021	\$10,869
11-31837.011-R-1	31-06-210-050-1011	1,848	9,021	\$10,869
11-31837.012-R-1	31-06-210-050-1012	1,848	9,021	\$10,869
11-31837.013-R-1	31-06-210-050-1013	43	211	\$254
11-31837.014-R-1	31-06-210-050-1014	43	211	\$254
11-31837.015-R-1	31-06-210-050-1015	43	211	\$254
11-31837.016-R-1	31-06-210-050-1016	43	211	\$254
11-31837.017-R-1	31-06-210-050-1017	43	211	\$254
11-31837.018-R-1	31-06-210-050-1018	43	211	\$254
11-31837.019-R-1	31-06-210-050-1019	43	211	\$254
11-31837.020-R-1	31-06-210-050-1020	43	211	\$254
11-31837.021-R-1	31-06-210-050-1021	43	211	\$254
11-31837.022-R-1	31-06-210-050-1022	43	211	\$254
11-31837.023-R-1	31-06-210-050-1023	43	211	\$254
11-31837.024-R-1	31-06-210-050-1024	43	211	\$254
11-31837.025-R-1	31-06-210-050-1025	2,225	10,862	\$13,087

11-31837.026-R-1	31-06-210-050-1026	2,225	10,862	\$13,087
11-31837.027-R-1	31-06-210-050-1027	2,225	10,862	\$13,087
11-31837.028-R-1	31-06-210-050-1028	2,225	10,862	\$13,087
11-31837.029-R-1	31-06-210-050-1029	2,225	10,862	\$13,087
11-31837.030-R-1	31-06-210-050-1030	2,225	10,862	\$13,087
11-31837.031-R-1	31-06-210-050-1031	2,225	10,862	\$13,087
11-31837.032-R-1	31-06-210-050-1032	2,225	10,862	\$13,087
11-31837.033-R-1	31-06-210-050-1033	2,225	10,862	\$13,087
11-31837.034-R-1	31-06-210-050-1034	2,225	10,862	\$13,087
11-31837.035-R-1	31-06-210-050-1035	2,225	10,862	\$13,087
11-31837.036-R-1	31-06-210-050-1036	2,225	10,862	\$13,087
11-31837.037-R-1	31-06-210-050-1038	2,225	10,862	\$13,087
11-31837.038-R-1	31-06-210-050-1039	2,225	10,862	\$13,087
11-31837.039-R-1	31-06-210-050-1040	2,225	10,862	\$13,087
11-31837.040-R-1	31-06-210-050-1041	2,225	10,862	\$13,087
11-31837.041-R-1	31-06-210-050-1042	2,225	10,862	\$13,087
11-31837.042-R-1	31-06-210-050-1043	2,225	10,862	\$13,087
11-31837.043-R-1	31-06-210-050-1044	2,225	10,862	\$13,087
11-31837.044-R-1	31-06-210-050-1046	2,225	10,862	\$13,087
11-31837.045-R-1	31-06-210-050-1047	2,225	10,862	\$13,087
11-31837.046-R-1	31-06-210-050-1048	2,225	10,862	\$13,087
11-31837.047-R-1	31-06-210-050-1049	2,225	10,862	\$13,087
11-31837.048-R-1	31-06-210-050-1050	2,225	10,862	\$13,087
11-31837.049-R-1	31-06-210-050-1051	2,225	10,862	\$13,087
11-31837.050-R-1	31-06-210-050-1053	2,225	10,862	\$13,087
11-31837.051-R-1	31-06-210-050-1054	2,225	10,862	\$13,087
11-31837.052-R-1	31-06-210-050-1055	2,225	10,862	\$13,087
11-31837.053-R-1	31-06-210-050-1056	2,225	10,862	\$13,087
11-31837.054-R-1	31-06-210-050-1057	2,225	10,862	\$13,087
11-31837.055-R-1	31-06-210-050-1058	2,225	10,862	\$13,087
11-31837.056-R-1	31-06-210-050-1059	2,225	10,862	\$13,087
11-31837.057-R-1	31-06-210-050-1060	2,225	10,862	\$13,087

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 assessments 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 of this appeal consists of 57 properties within a condominium association. The condominium has 228,466 square feet of land and is located in Tinley Park, Rich Township, Cook County. The property is classified as class 2-99 residential condominium under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation based on the sale of one condominium unit. The information provided by the appellant's counsel disclosed the condominium unit sold in March 2010 for a price of \$139,900. The median consideration from sales and/or market listing was reportedly \$129,450 according to counsel. From this total the appellant's counsel deducted \$7,767 or 6% for personal property to arrive at a total adjusted consideration of \$121,683. The appellant's counsel then multiplied the total adjusted consideration by 8.50% for a fair market value of \$10,343. The appellant's counsel then deducted the average land assessed value of \$1,686 to arrive at an approximate total building assessed value of \$8,657. Based on this analysis, the appellant requested a total assessment reduction to \$468,169 for all 57 parcels.

The board of review submitted its "Board of Review Notes on Appeal" wherein its final assessments of the subject totaling \$565,347 was disclosed. The subjects' assessments reflect a market value of \$5,653,470, when using the level of assessments for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. From the evidence in this file, there appears to be two assessments for condominiums, \$10,869 and \$13,087. These assessments reflect market values of \$108,690 and \$130,870 per condominium unit. The subject also appears to have 12 garages with assessments of \$254 or market values of \$2,540 per garage. No other information as to which units have garages was submitted.

In support of the assessments, the board of review submitted an assessment analysis that relied on three sales from the condominium development. The sales occurred from February 2008 to October 2009 for prices ranging from \$198,500 to \$204,000. Based on this evidence the board of review requested confirmation of the subjects' assessments.

The appellant submitted a rebuttal brief critiquing the board of review's evidence.

Conclusion of Law

After reviewing the record and considering the evidence, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal. The Board further finds the evidence in the record does not support a reduction in the subject's assessment.

The appellant contends overvaluation as the basis of the appeal. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3rd Dist. 2002). The Board finds the appellant has not met this burden of proof and a reduction in the subject's assessment is not warranted.

In support of the overvaluation argument the appellant provided evidence that a condominium unit from the subjects' condominium development sold in March 2010 for \$139,900. In its

evidence the board of review used sales from the subjects' condominium development that occurred from February 2008 to October 2009 for prices ranging from \$198,500 to \$204,000, which the Board finds are dated and not probative of the subjects' market values as of January 1, 2011. The Board finds the best evidence of market value in the record is the appellants' sale from March 2010 for \$139,900. The subjects' assessments of \$108,690 and \$130,870 per unit fall below the market value of the best comparable sale in this record, even when adding a garage value of \$2,540. The Board finds the subjects' assessments are not excessive in relation to the sale of a similar property.

In their respective analyses the appellant and board of review made deductions from the purchase prices to account for personal property. The Property Tax Appeal Board finds there is no evidence in this record that supports these deductions. Neither the appellant nor the board of review provided sales contracts or copies of the Real Estate Transfer Declarations associated with the respective sales to demonstrate there was any consideration given for personal property. Nor did either party provide any separate listing of what items were considered personal property and the value of the respective items.

In conclusion, the Property Tax Appeal Board finds the evidence in this record does not demonstrate the assessment of the properties are excessive in relation to the sale of a similar property and reductions in the assessments are not justified.

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.