



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

APPELLANT: 440-42 Aldine Condominium Association
DOCKET NO.: 12-21532.001-R-1 through 12-21532.006-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 440-42 Aldine Condominium Association, the appellant(s), by attorney Steven Wise, of Abbey Road Tax Consultants LLC 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
12-21532.001-R-1	14-21-310-064-1001	7,884	46,830	\$54,714
12-21532.002-R-1	14-21-310-064-1002	7,885	46,830	\$54,715
12-21532.003-R-1	14-21-310-064-1003	7,885	46,830	\$54,715
12-21532.004-R-1	14-21-310-064-1004	7,884	46,830	\$54,714
12-21532.005-R-1	14-21-310-064-1005	7,885	46,830	\$54,715
12-21532.006-R-1	14-21-310-064-1006	7,885	46,830	\$54,715

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 2012 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 six-unit residential condominium. It is 94 years old. The property has a 9,960 square foot site and is located in Lake View Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on one equity comparable located on the subject's street. The comparable has seven residential units.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$328,288. In support of its contention of the correct assessment the board of review submitted a condominium sales analysis. The board's analysis is based on the 2009 sale of subject Permanent Index Number ("PIN") 1003 for a price of \$652,575. The board's analysis deducted 2% for personal property resulting in an adjusted consideration of \$639,524. This amount was divided by PIN 1009's percentage of ownership of 16.667% resulting in a full market value for the subject building as a whole of \$3,837,136, or an assessment of \$383,713 when applying the 2012 level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. Based on this analysis, the board requested confirmation of the subject's assessment.

In written rebuttal, the appellant submitted a printout of an advertisement for the subject property.

At hearing, the appellant argued that his comparable is identical to the subject property and therefore the subject's assessment should be reduced to equal the assessment of the comparable property. The board of review's representative stated that the appellant's comparable is not identical to the subject as it has a different number of units. The board's representative rested on the previously submitted evidence. The appellant's attorney stated the basis of the appellant's argument is assessment equity and not market value.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet his burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds that the appellant's one comparable property is not sufficient to meet the requirements of 86 Ill.Admin.Code §1910.65(b), which requires not less than three comparable properties. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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(b) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(b)) 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



Acting 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: January 16, 2018



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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