



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

APPELLANT: William Dunn  
DOCKET NO.: 12-32425.001-R-1 through 12-32425.006-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are William Dunn, the appellant, 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 **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:

| <b>DOCKET NO</b> | <b>PARCEL NUMBER</b> | <b>LAND</b> | <b>IMPRVMT</b> | <b>TOTAL</b> |
|------------------|----------------------|-------------|----------------|--------------|
| 12-32425.001-R-1 | 13-12-421-022-1001   | 1,804       | 25,437         | \$27,241     |
| 12-32425.002-R-1 | 13-12-421-022-1004   | 1,849       | 26,075         | \$27,924     |
| 12-32425.003-R-1 | 13-12-421-022-1005   | 1,827       | 25,766         | \$27,593     |
| 12-32425.004-R-1 | 13-12-421-022-1006   | 2,006       | 28,279         | \$30,285     |
| 12-32425.005-R-1 | 13-12-421-022-1007   | 1,930       | 27,208         | \$29,138     |
| 12-32425.006-R-1 | 13-12-421-022-1008   | 1,893       | 26,693         | \$28,586     |

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 of this appeal consists of six condominium units. The dwellings are five years old. The property has an 8,349 square foot site and is located at 4809 N. California Avenue, Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted limited evidence disclosing the six units plus an additional parcel in the condominium were purchased on December 27, 2012 for a price of \$1,340,000, which is 12 months after the

January 1, 2012 assessment date at issue. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing that the subject condominium has 9 separate property identification numbers (PIN's). The seven PIN's that sold have a total assessment of \$171,450, which reflect a market value of \$1,714,500, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. One of the PIN's had a total assessed value of \$803, which reflects a market value of \$8,030.

In support of the assessment the board of review submitted a condominium assessment analysis based on the sale of one of the condominium units located at 4809 N. Californian Avenue, Chicago, Illinois, that sold in April 8, 2011 for \$299,000. Based on this evidence, 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 not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant provided limited evidence of the sale of the subject. The appellant failed to complete Section IV - Recent Sale Data of the appeal which would have disclosed the length of time the property was marketed. The appellant's evidence included a copy of a settlement statement, however, there is no indication as to the length of time the subject was marketed.

The Board finds the best evidence of market value in the record to be the board of review's comparable sale of one of the condominium units located at 4809 N. Californian Avenue, Chicago, Illinois, that sold in April 8, 2011 for \$299,000. The arm's-length nature of this sale was not disputed by the appellant. The six units under appeal have market values ranging from \$272,410 to \$302,850, which are supported by the sale submitted by the board of review. After reviewing the board of review's sale evidence and the sales evidence submitted by the appellant, the Board finds the subject's assessment is reflective of market value and a reduction in the subject's assessment is 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.