



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Metropolitan Square  
DOCKET NO.: 12-35271.001-R-2 through 12-35271.142-R-2  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Metropolitan Square, the appellant(s), by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; the Cook County Board of Review; the Des Plaines S.D. #62, and Maine T.H.S.D. #207, intervenors, by attorney Ares G. Dalianis of Franczek Radelet P.C. in Chicago.

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
12-35271.001-R-2	09-17-415-043-1001	323	16,815	\$ 17,138
12-35271.002-R-2	09-17-415-043-1002	325	16,941	\$ 17,266
12-35271.003-R-2	09-17-415-043-1003	266	13,887	\$ 14,153
12-35271.004-R-2	09-17-415-043-1004	274	14,264	\$ 14,538
12-35271.005-R-2	09-17-415-043-1005	240	12,521	\$ 12,761
12-35271.006-R-2	09-17-415-043-1006	172	9,000	\$ 9,172
12-35271.007-R-2	09-17-415-043-1007	240	12,521	\$ 12,761
12-35271.008-R-2	09-17-415-043-1008	176	9,162	\$ 9,338
12-35271.009-R-2	09-17-415-043-1009	181	9,467	\$ 9,648
12-35271.010-R-2	09-17-415-043-1010	177	9,216	\$ 9,393
12-35271.011-R-2	09-17-415-043-1011	242	12,629	\$ 12,871
12-35271.012-R-2	09-17-415-043-1012	292	15,198	\$ 15,490
12-35271.013-R-2	09-17-415-043-1013	323	16,815	\$ 17,138
12-35271.014-R-2	09-17-415-043-1014	325	16,941	\$ 17,266
12-35271.015-R-2	09-17-415-043-1015	266	13,942	\$ 14,208
12-35271.016-R-2	09-17-415-043-1016	274	14,264	\$ 14,538
12-35271.017-R-2	09-17-415-043-1017	240	12,521	\$ 12,761
12-35271.018-R-2	09-17-415-043-1018	172	9,000	\$ 9,172
12-35271.019-R-2	09-17-415-043-1019	240	12,521	\$ 12,761
12-35271.020-R-2	09-17-415-043-1020	176	9,162	\$ 9,338
12-35271.021-R-2	09-17-415-043-1021	181	9,467	\$ 9,648
12-35271.022-R-2	09-17-415-043-1022	177	9,216	\$ 9,393
12-35271.023-R-2	09-17-415-043-1023	242	12,629	\$ 12,871
12-35271.024-R-2	09-17-415-043-1024	292	15,198	\$ 15,490

12-35271.025-R-2	09-17-415-043-1025	323	16,815	\$ 17,138
12-35271.026-R-2	09-17-415-043-1026	325	16,941	\$ 17,266
12-35271.027-R-2	09-17-415-043-1027	266	13,942	\$ 14,208
12-35271.028-R-2	09-17-415-043-1028	274	14,264	\$ 14,538
12-35271.029-R-2	09-17-415-043-1029	240	12,521	\$ 12,761
12-35271.030-R-2	09-17-415-043-1030	172	9,000	\$ 9,172
12-35271.031-R-2	09-17-415-043-1031	240	17,025	\$ 17,265
12-35271.032-R-2	09-17-415-043-1032	172	9,000	\$ 9,172
12-35271.033-R-2	09-17-415-043-1033	181	9,467	\$ 9,648
12-35271.034-R-2	09-17-415-043-1034	177	9,216	\$ 9,393
12-35271.035-R-2	09-17-415-043-1035	242	12,629	\$ 12,871
12-35271.036-R-2	09-17-415-043-1036	292	15,198	\$ 15,490
12-35271.037-R-2	09-17-415-043-1037	323	16,815	\$ 17,138
12-35271.038-R-2	09-17-415-043-1038	325	16,941	\$ 17,266
12-35271.039-R-2	09-17-415-043-1039	266	13,885	\$ 14,151
12-35271.040-R-2	09-17-415-043-1040	274	14,264	\$ 14,538
12-35271.041-R-2	09-17-415-043-1041	240	12,521	\$ 12,761
12-35271.042-R-2	09-17-415-043-1042	172	9,000	\$ 9,172
12-35271.043-R-2	09-17-415-043-1043	240	12,521	\$ 12,761
12-35271.044-R-2	09-17-415-043-1044	176	9,162	\$ 9,338
12-35271.045-R-2	09-17-415-043-1045	181	9,467	\$ 9,648
12-35271.046-R-2	09-17-415-043-1046	177	9,216	\$ 9,393
12-35271.047-R-2	09-17-415-043-1047	242	12,629	\$ 12,871
12-35271.048-R-2	09-17-415-043-1048	292	15,198	\$ 15,490
12-35271.049-R-2	09-17-415-043-1049	323	16,815	\$ 17,138
12-35271.050-R-2	09-17-415-043-1050	325	16,941	\$ 17,266
12-35271.051-R-2	09-17-415-043-1051	266	13,887	\$ 14,153
12-35271.052-R-2	09-17-415-043-1052	274	14,264	\$ 14,538
12-35271.053-R-2	09-17-415-043-1053	240	12,521	\$ 12,761
12-35271.054-R-2	09-17-415-043-1054	172	9,000	\$ 9,172
12-35271.055-R-2	09-17-415-043-1055	240	12,521	\$ 12,761
12-35271.056-R-2	09-17-415-043-1056	176	9,162	\$ 9,338
12-35271.057-R-2	09-17-415-043-1057	181	9,467	\$ 9,648
12-35271.058-R-2	09-17-415-043-1058	177	9,216	\$ 9,393
12-35271.059-R-2	09-17-415-043-1059	242	12,629	\$ 12,871
12-35271.060-R-2	09-17-415-043-1060	292	15,198	\$ 15,490
12-35271.061-R-2	09-17-415-043-1061	323	16,815	\$ 17,138
12-35271.062-R-2	09-17-415-043-1062	515	26,839	\$ 27,354
12-35271.063-R-2	09-17-415-043-1063	266	13,887	\$ 14,153
12-35271.064-R-2	09-17-415-043-1064	274	14,264	\$ 14,538
12-35271.065-R-2	09-17-415-043-1065	240	12,521	\$ 12,761
12-35271.066-R-2	09-17-415-043-1066	172	9,000	\$ 9,172
12-35271.067-R-2	09-17-415-043-1067	240	12,521	\$ 12,761
12-35271.068-R-2	09-17-415-043-1068	172	9,000	\$ 9,172
12-35271.069-R-2	09-17-415-043-1069	181	9,467	\$ 9,648

12-35271.070-R-2	09-17-415-043-1070	177	9,216	\$ 9,393
12-35271.071-R-2	09-17-415-043-1071	242	12,629	\$ 12,871
12-35271.072-R-2	09-17-415-043-1072	292	15,198	\$ 15,490
12-35271.073-R-2	09-17-415-043-1073	275	14,354	\$ 14,629
12-35271.074-R-2	09-17-415-043-1074	189	9,880	\$ 10,069
12-35271.075-R-2	09-17-415-043-1075	189	9,880	\$ 10,069
12-35271.076-R-2	09-17-415-043-1076	263	13,689	\$ 13,952
12-35271.077-R-2	09-17-415-043-1077	189	9,880	\$ 10,069
12-35271.078-R-2	09-17-415-043-1078	189	9,880	\$ 10,069
12-35271.079-R-2	09-17-415-043-1079	271	14,102	\$ 14,373
12-35271.080-R-2	09-17-415-043-1080	289	15,072	\$ 15,361
12-35271.081-R-2	09-17-415-043-1081	209	10,886	\$ 11,095
12-35271.082-R-2	09-17-415-043-1082	204	10,617	\$ 10,821
12-35271.083-R-2	09-17-415-043-1083	281	14,659	\$ 14,940
12-35271.084-R-2	09-17-415-043-1084	204	10,617	\$ 10,821
12-35271.085-R-2	09-17-415-043-1085	209	10,886	\$ 11,095
12-35271.086-R-2	09-17-415-043-1086	316	16,456	\$ 16,772
12-35271.087-R-2	09-17-415-043-1087	283	14,749	\$ 15,032
12-35271.088-R-2	09-17-415-043-1088	189	9,880	\$ 10,069
12-35271.089-R-2	09-17-415-043-1089	189	9,880	\$ 10,069
12-35271.090-R-2	09-17-415-043-1090	263	13,689	\$ 13,952
12-35271.091-R-2	09-17-415-043-1091	189	9,880	\$ 10,069
12-35271.092-R-2	09-17-415-043-1092	189	9,880	\$ 10,069
12-35271.093-R-2	09-17-415-043-1093	271	14,102	\$ 14,373
12-35271.094-R-2	09-17-415-043-1094	297	15,468	\$ 15,765
12-35271.095-R-2	09-17-415-043-1095	221	11,551	\$ 11,772
12-35271.096-R-2	09-17-415-043-1096	216	11,264	\$ 11,480
12-35271.097-R-2	09-17-415-043-1097	285	14,875	\$ 15,160
12-35271.098-R-2	09-17-415-043-1098	216	11,264	\$ 11,480
12-35271.099-R-2	09-17-415-043-1099	221	11,551	\$ 11,772
12-35271.100-R-2	09-17-415-043-1100	320	16,671	\$ 16,991
12-35271.101-R-2	09-17-415-043-1101	283	14,749	\$ 15,032
12-35271.102-R-2	09-17-415-043-1102	189	9,880	\$ 10,069
12-35271.103-R-2	09-17-415-043-1103	189	9,880	\$ 10,069
12-35271.104-R-2	09-17-415-043-1104	263	13,689	\$ 13,952
12-35271.105-R-2	09-17-415-043-1105	189	9,880	\$ 10,069
12-35271.106-R-2	09-17-415-043-1106	189	9,880	\$ 10,069
12-35271.107-R-2	09-17-415-043-1107	271	14,102	\$ 14,373
12-35271.108-R-2	09-17-415-043-1108	297	15,468	\$ 15,765
12-35271.109-R-2	09-17-415-043-1109	221	11,551	\$ 11,772
12-35271.110-R-2	09-17-415-043-1110	216	11,264	\$ 11,480
12-35271.111-R-2	09-17-415-043-1111	285	14,875	\$ 15,160
12-35271.112-R-2	09-17-415-043-1112	216	11,264	\$ 11,480
12-35271.113-R-2	09-17-415-043-1113	221	11,551	\$ 11,772
12-35271.114-R-2	09-17-415-043-1114	320	18,072	\$ 18,392

12-35271.115-R-2	09-17-415-043-1115	283	14,749	\$ 15,032
12-35271.116-R-2	09-17-415-043-1116	189	9,880	\$ 10,069
12-35271.117-R-2	09-17-415-043-1117	189	9,880	\$ 10,069
12-35271.118-R-2	09-17-415-043-1118	263	13,689	\$ 13,952
12-35271.119-R-2	09-17-415-043-1119	189	9,880	\$ 10,069
12-35271.120-R-2	09-17-415-043-1120	189	9,880	\$ 10,069
12-35271.121-R-2	09-17-415-043-1121	271	14,102	\$ 14,373
12-35271.122-R-2	09-17-415-043-1122	297	16,766	\$ 17,063
12-35271.123-R-2	09-17-415-043-1123	221	11,551	\$ 11,772
12-35271.124-R-2	09-17-415-043-1124	216	11,264	\$ 11,480
12-35271.125-R-2	09-17-415-043-1125	285	14,875	\$ 15,160
12-35271.126-R-2	09-17-415-043-1126	216	11,264	\$ 11,480
12-35271.127-R-2	09-17-415-043-1127	221	11,551	\$ 11,772
12-35271.128-R-2	09-17-415-043-1128	320	16,671	\$ 16,991
12-35271.129-R-2	09-17-415-043-1129	283	14,749	\$ 15,032
12-35271.130-R-2	09-17-415-043-1130	189	9,880	\$ 10,069
12-35271.131-R-2	09-17-415-043-1131	189	9,880	\$ 10,069
12-35271.132-R-2	09-17-415-043-1132	263	13,689	\$ 13,952
12-35271.133-R-2	09-17-415-043-1133	189	9,880	\$ 10,069
12-35271.134-R-2	09-17-415-043-1134	189	9,880	\$ 10,069
12-35271.135-R-2	09-17-415-043-1135	271	14,102	\$ 14,373
12-35271.136-R-2	09-17-415-043-1136	297	15,468	\$ 15,765
12-35271.137-R-2	09-17-415-043-1137	221	11,551	\$ 11,772
12-35271.138-R-2	09-17-415-043-1138	216	11,264	\$ 11,480
12-35271.139-R-2	09-17-415-043-1139	285	14,875	\$ 15,160
12-35271.140-R-2	09-17-415-043-1140	216	11,264	\$ 11,480
12-35271.141-R-2	09-17-415-043-1141	221	11,551	\$ 11,772
12-35271.142-R-2	09-17-415-043-1142	457	23,821	\$ 24,278

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 16-185 of the Property Tax Code (35 ILCS 200/16-185) challenging the assessment for the 2012 tax year. The Property Tax Appeal Board (the "Board") finds that it has jurisdiction over the parties and the subject matter of the appeal.

### **Findings of Fact**

The subject consists of 142 condominium units with a combined 100.00% ownership interest in the common elements. The property is located in Des Plaines, Maine Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance. No evidence was submitted as to whether any of the subject units are owner occupied.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant argued that 19 units in the subject's building, or 13.4640% of ownership, sold from February 2010 to December 2012 for an aggregate price of \$2,384,650. An allocation of 10.00% for personal property was subtracted from the aggregate sales price, and then divided by the percentage of interest of the units sold to arrive at a total market value for the building of \$15,940,174.<sup>1</sup> The appellant requested that the subject's assessment be reduced to 10.00% of this market value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$1,837,875. The subject's assessment reflects a market value of \$18,378,750 when applying the 2012 statutory level of assessment for class 2 property under the Cook County Real Property Assessment Classification ordinance of 10.00%.

In support of the subject's assessment, the board of review submitted a memorandum, which shows that seven units in the subject's building, or 5.3450% of ownership, sold from May 2010 to April 2012 for an aggregate price of \$1,104,000. An allocation of 11.00% for personal property was subtracted from the aggregate sales price, and then divided by the percentage of interest of the units sold to arrive at a total market value for the building of \$18,382,862.

The intervenors adopted the board of review's evidence.

### **Conclusion of Law**

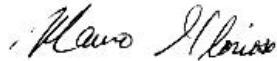
The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist 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.

Initially, the Board notes that appellant comparables #1, #5, #6, and #13 represent the same sales as board of review comparables #1, #2, #3, and #7, respectively. The Board finds that the best evidence of the subject's market value is the appellant's comparables, and the board of review's comparables. Thus, the Board will take the sum of the sale prices of the most similar sales, divide by the total percentage of ownership of the units sold, and multiply the result by the subject's percentage of ownership. However, the Board is not persuaded by either parties' argument that there should be a reduction in the purchase prices because those prices included personal property. There is no evidence to suggest that personal property was included in the sales, other than the parties conflicting, and arbitrary, assertions in the pleadings. The Board finds the subject's current assessment is supported by the evidence in the record. Therefore, the Board finds that the appellant has not proven, by a preponderance of the evidence, that the subject is overvalued, and a reduction in the subject's assessment is not warranted.

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<sup>1</sup> The Board notes that the appellant's brief states that these 19 units have a combined ownership interest of 13.48%; however, the Board's own calculations determined that these units' combined ownership interest is 13.464%. This latter figure has been used in determining the total market value for the subject.

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: \_\_\_\_\_

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:

February 20, 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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