



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

APPELLANT: Dev Patel  
DOCKET NO.: 13-29228.001-R-1 through 13-29228.002-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Dev Patel, the appellant(s), by attorney Nicholas T. McIntyre, of Worsek & Vihon 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
13-29228.001-R-1	20-24-424-024-1003	708	8,052	\$ 8,760
13-29228.002-R-1	20-24-424-024-1007	765	8,696	\$ 9,461

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 2013 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 two condominium units. The unit with the PIN ending in -1003 has a 12.50% ownership interest in the common elements. The unit with the PIN ending in -1007 has a 13.50% ownership interest in the common elements. The subject is located in Chicago, Hyde Park 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 the subject units are owner occupied.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted evidence disclosing that each of the subject units were recently purchased. According to the appellant's evidence, PIN -1003 was purchased on July 25, 2011 for a price of \$38,000, while PIN -1007 was purchased on October 5, 2011 for a price of \$37,000. The

appellant also offered evidence of two other sales of units within the subject's building with a combined percentage of ownership of 26.00%, which sold in May 2010 and February 2013 for an aggregate price of \$81,000. The appellant took the aggregate sale price of all four units of \$157,000, and deducted 9.00% for personal property. This adjusted sale price was then divided by these four units' aggregate percentage of ownership to arrive at a total market value for the building of \$288,626. The subject's percentage of ownership of 26.00% was then utilized to arrive at a market value for the subject of \$75,043. Based on this evidence, the appellant requested a reduction in the subject's assessment to 9.00% of this market value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$18,221. The subject's assessment reflects a market value of \$182,210 when applying the 2013 statutory level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

In support of the subject's assessment, the board of review submitted a memorandum which shows that one unit in the subject's building, plus the subject unit with PIN -1007, or 24.50% of ownership, sold in January 2006 and April 2011, respectively, for an aggregate price of \$202,000. An allocation of 15.00% for personal property was subtracted from the aggregate sale price, and then divided by the percentage of interest of the units sold to arrive at a total market value for the building of \$700,816.

### **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 only evidence submitted in support of the sale of the subject units in July 2011 for \$38,000 and October 2011 for \$37,000 was printouts from the Cook County Recorder of Deeds' website. The questions in Section IV – Recent Sale Data of the Board's residential appeal form were left unanswered. Thus, there is no evidence to show whether these sales were arm's-length transactions. The Board finds that the printouts from the Cook County Recorder of Deeds' website is not enough to prove that the subject is overvalued by a preponderance of the evidence. The Board further finds that it could not reduce the subject unit's assessments based on their recent sales unless those sales were arm's-length transactions, and there was no evidence submitted to show as such. Therefore, the Board finds that the subject is not overvalued, and a reduction is not warranted.

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: \_\_\_\_\_

February 24, 2017



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.