



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

APPELLANT: 2527 West Harrison Condo Assoc.
DOCKET NO.: 14-31130.001-R-1 through 14-31130.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 2527 West Harrison Condo Assoc., the appellant(s), by attorney Kevin B. Hynes, of O'Keefe Lyons & Hynes, 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
14-31130.001-R-1	16-13-402-048-1001	2,704	17,096	\$19,800
14-31130.002-R-1	16-13-402-048-1002	1,502	9,498	\$11,000
14-31130.003-R-1	16-13-402-048-1003	1,462	9,246	\$10,708

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 2014 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 consists of a three unit condominium building. The property is located in Chicago, West Chicago 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 overvaluation as the basis of the appeal. In support of this argument, the appellant submitted two sale comparables of two units which sold in a class 2-99 building located next door to the subject. The two sale comparables sold in January 2013 for \$104,500 and in March 2013 for \$104,900. Based on this evidence, the appellant requested a reduction of the subject's assessment.

The appellant also contends assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on one equity comparable. The comparable is a similar three unit building located next door with a total assessment of \$28,559.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$19,800. The subject's assessment reflects a market value of \$198,000 when using the 10 % level of assessment for Cook County as determined by the Cook County Classification Code.

In support of the assessment, the board of review submitted an analysis prepared by Dan Michaelides, an analyst with the Cook County Board of Review. He indicated the total consideration for the sale of one residential units in the subject's condominium from 2010 was \$125,000. The analyst deducted \$2,500 or 2% of the total sales prices from the total consideration to account for personal property to arrive at a total adjusted consideration of \$122,500. Dividing the total adjusted consideration by the percentage of interest of ownership in the condominium for the units that sold of 26.50% indicated a full value for the condominium property of \$462,264. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant's attorney stated that the board of review did not address the appellant's uniformity argument and that the board of review's sale comparable was four years prior to the 2014 lien date.

Conclusion of Law

The taxpayer also 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 this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the appellant failed to submit three comparables. The appellant submitted one equity comparable for a three unit building located next door. However, the appellant's one equity comparable does not constitute a range. Therefore, the Board finds the appellant failed to meet his burden and reduction is not warranted.

The appellant also 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 Board finds that the appellant failed to submit three comparables. The appellant submitted two sale comparables for two units located in a similar building. The appellant's two similar comparables do not constitute a range. Therefore, the Board finds the appellant failed to meet his burden and 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



Acting 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: _____

May 19, 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.