



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

APPELLANT: Mid-America Asset Management, LLC
DOCKET NO.: 15-25014.001-R-1
PARCEL NO.: 14-20-312-003-0000

The parties of record before the Property Tax Appeal Board are Mid-America Asset Management, LLC, the appellant, by attorney Katherine Amari O'Dell, of Amari & Locallo 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:

LAND: \$26,157
IMPR.: \$102,042
TOTAL: \$128,199

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 2015 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 is improved with a two-story, mixed-use building of masonry construction. The building is approximately 100 years old and has 4,666 square feet of building area. Features of the building include three apartment units, a partial unfinished basement and a three-car garage. Based upon photographic evidence provided by the parties, the building has at least one commercial unit. The property has a 4,671 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-12 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 four equity comparables with the same

¹ On the appellant's grid analysis, the subject was described as a three-story building; however, photographic evidence submitted by the parties indicates the subject is a two-story building.

assigned neighborhood and classification codes as the subject. The comparables are improved with two or three-story, mixed-use buildings of masonry construction. The buildings are from 97 to 134 years old. The comparables had features with varying degrees of similarity when compared to the subject. The appellant's grid analysis indicates the buildings range in size from 3,510 to 4,700 square feet of building area, and their improvement assessments range from \$56,722 to \$64,874 or from \$13.80 to \$16.16 per square foot of building area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$64,390 or \$13.80 per square foot of building area.

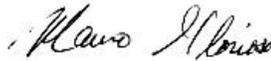
The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's final assessment of \$128,199 was disclosed. The subject property has an improvement assessment of \$102,042 or \$21.87 per square foot of building area. The board of review presented descriptions and assessment information on three suggested comparable properties with the same assigned neighborhood and classification codes as the subject. The comparables are improved with two or three-story, mixed-use buildings of masonry construction. The buildings are from 114 to 120 years old. The comparables had features of varying degrees of similarity when compared to the subject. The board of review's grid analysis indicates the buildings range in size from 3,000 to 8,874 square feet of building area and their improvement assessments range from \$68,272 to \$246,059 or from \$22.76 to \$51.91 per square foot of building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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

The parties presented assessment data on a total of seven suggested comparables. The Board finds the appellant's comparables #1 through #3 and board of review comparable #2 were three-story buildings that were dissimilar from the subject's two-story design. In addition, the appellant's comparables #1 and #2 and board of review comparables #2 and #3 differed significantly from the subject in building area. As a result, the appellant's comparables #1 through #3 and board of review comparables #2 and #3 received reduced weight in the Board's analysis. The Board finds the best evidence of assessment equity to be the appellant's comparables #4 and board of review comparable #1. These comparables were two-story buildings like the subject that were also very similar to the subject in building area. These comparables had improvement assessments of \$13.80 and \$51.91 per square foot of building area. The subject's improvement assessment of \$21.87 per square foot of building area falls between the improvement assessments of the best comparables in this record. 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(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) 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



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: June 19, 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.

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PARTIES OF RECORD

AGENCY

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