



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

APPELLANT: 5217 S Greenwood Condominium Association  
DOCKET NO.: 15-29631.001-R-2 through 15-29631.004-R-2  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 5217 S Greenwood Condominium Association, the appellant, by attorney Timothy E. Moran, of Schmidt Salzman & Moran, Ltd. 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>
15-29631.001-R-2	20-11-311-034-1001	4,513	32,503	\$37,016
15-29631.002-R-2	20-11-311-034-1002	5,696	41,019	\$46,715
15-29631.003-R-2	20-11-311-034-1003	5,685	40,941	\$46,626
15-29631.004-R-2	20-11-311-034-1004	5,804	41,801	\$47,605

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 of this appeal is a four-unit condominium building of masonry exterior construction with 9,600 square feet of building area. The building is 104 years old. The property has a 6,576-square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-99 residential condominium property under the Cook County Real Property Assessment Classification Ordinance.

The appellant, through counsel, submitted evidence before the Property Tax Appeal Board claiming the assessments of the condominium units are incorrect based upon a contention of law and assessment inequity. In support of this argument the appellant submitted limited information on five equity comparables which are located within the same neighborhood code as the subject

property. The comparables consist of three-story apartment buildings that range in age from 95 to 103 years old. The comparables were classified as class 2-11 apartment buildings under the Cook County Real Property Assessment Classification Ordinance. The comparables had features with varying degrees of similarity when compared to the subject. The buildings range in size from 9,282 to 9,669 square feet of building area and have improvement assessments ranging from \$42,885 to \$54,137 or from \$4.54 to \$5.83 per square foot of building area. Based upon this evidence, the appellant requested the total assessment be reduced to \$52,175.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$177,962. The subject's total assessment reflects a market value of \$1,779,620 when applying the ordinance level of assessment for class 2-99 property. The subject property has an improvement assessment of \$156,264 or \$16.28 per square foot of building area. In support of the assessment the board of review used two sales of units in the condominium that occurred in April 2013 for a price of \$480,000, and in May 2015 for a price of \$568,000. Using these sales, the board of review arrived at an estimated value for the subject property of \$1,779,620. 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 appellant submitted information on a total of five suggested equity comparables for the Board's consideration. The Board finds, however, the comparables were not condominium units as were the subject units. The Board finds each of the appellant's comparables had a different classification code than the subject property, which detracts from the weight that can be given to the evidence. Additionally, the appellant did not provide any market data demonstrating the comparables and the subject property had similar values but were assessed at substantially different proportions of fair cash value. The board of review provided sales data demonstrating the subject's assessment is reflective of fair cash value. 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 thus 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



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: July 17, 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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