



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

APPELLANT: Dorothy Laskowski
DOCKET NO.: 15-31164.001-R-1 through 15-31164.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Dorothy Laskowski, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
15-31164.001-R-1	09-36-410-026-1004	959	11,914	\$12,873
15-31164.002-R-1	09-36-410-026-1010	233	2,898	\$3,131

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 consists of a residential condominium unit and a designated parking space located at 6625 N. Northwest Highway, Units #1004 and #1010, Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted evidence disclosing the subject property was purchased on August 22, 2013, for a price of \$110,000. The appellant also submitted an appraisal report in which a certified appraiser estimated the subject property had a market value of \$120,000 as of July 19, 2013. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the combined total assessment for the subject's two parcels of \$16,004. The subject's assessment reflects a market value of \$160,040, when applying the 10% level of assessment for class 2 residential properties under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted an explanation outlining the method of assessing the subject condominium unit. The evidence indicates the building's estimated market value was derived from five sales that occurred from August 2013 through June 2015 for prices that totaled \$595,000. Two of the five sales were for the subject's two parcels. The personal property of these five sales was estimated to be 8% or \$47,600. The total amount less personal property (\$547,400) was divided by the total ownership percentage (47.2%) to arrive at the building's estimated market value of \$1,159,745. The assessed value of the subject's two parcels was based on their pro rata share of ownership (13.8%) or \$160,044. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant's attorney asserted that the board of review's analysis should be given no weight because it relied on "five raw, unadjusted sales within the subject building."

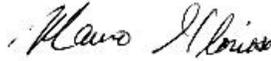
Conclusion of Law

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 Board considered the subject's August 22, 2013 sale for a price of \$110,000 and the appraisal report in which the subject property was estimated to have a market value of \$120,000 as of July 19, 2013. The Board gave less weight to the appellant's evidence, because the Board considers both the subject's August 2013 sale and the July 2013 appraisal report to be dated. The Board finds the information relied on by the appellant is over 16 months old and is less probative of value for an appeal with an assessment date of January 1, 2015.

The Board finds the three best comparable sales in the record to be unit 1001 that sold in June 2015 for a price of \$175,000; unit 1005 that sold in July 2014 for a price of \$155,000; and unit 1006 that sold in May 2014 for a price of \$155,000. The Board finds these properties had sale dates that were most proximate in time to the January 1, 2015 assessment date and their sale prices totaled \$485,000. Using the board of review analysis, the personal property of these three sales was estimated to be 8% or \$38,800. The total amount less personal property (\$446,200) was divided by the total ownership percentage of the condominiums that sold (33.4%) to arrive at the condominium's total estimated market value of \$1,335,928. Using this analysis, the subject's two parcels have a market value of \$184,358 based on their pro rata share of ownership of the condominium (\$1,335,928 x 13.8%). The Board finds the subject's assessment of \$16,004 reflects a market value of \$160,040, which is supported by the analysis of the three best comparable sales in the record. Based on this record, the Board finds 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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