



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

APPELLANT: Brenda Tribble
DOCKET NO.: 15-32041.001-R-1 through 15-32041.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Brenda Tribble, the appellant, by attorney David C. Dunkin, of Arnstein & Lehr, LLP 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 **A Reduction** 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
15-32041.001-R-1	20-24-425-008-1021	1,092	1,092	\$2,184
15-32041.002-R-1	20-24-425-008-1037	107	100	\$207

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 (#301) and a designated parking space (#G7) located at 7015 South Paxton Avenue, 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.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted information on two comparable sales that were described as condominium units in the same building as the subject. Unit #208 and its designated parking space G12 sold in November 2013 for a price of \$25,000, and unit #103 sold in July 2014 for a price of \$30,000. The appellant's attorney stated these two sales were the only units in the building to sell between 2012 and 2015. Counsel also submitted an explanation outlining the method of assessing the subject condominium unit. The subject property's estimated market value was derived from these two comparable sales. The total consideration for these two sales was \$55,000. No

adjustments were applied to these sales, and descriptions of the properties were not provided. The personal property of the two sales was estimated to be 2% or \$4,000. The total amount less personal property (\$51,000) was divided by their total ownership percentage (7.210%) to arrive at the building's estimated market value of \$707,351. The subject's assessed value was based on its pro rata share of ownership of the building (0.03380%) or \$23,908. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject's two parcels of \$8,042. The subject's assessment reflects a market value of \$80,420 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 three sales that occurred in April and December 2008 for sale prices that totaled \$150,000. No adjustments were applied to these sales, and descriptions of these properties were not provided by the board of review. The personal property of these three sales was estimated to be 1% or \$1,500. The total amount less personal property (\$148,500) was divided by the total ownership percentage (6.37%) to arrive at the building's estimated market value of \$2,331,240. The subject's assessed value was based on its pro rata share of ownership of the building (0.033830%) or \$78,866. Based on this evidence, the board of review requested confirmation of the subject's assessment.

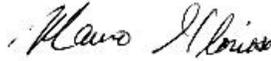
The appellant's attorney submitted a rebuttal brief, in which counsel asserted that the board of review had relied on sales that occurred in 2008.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds that both parties used the same methodology to arrive at an estimate of the subject's market value. The board of review's assessment reflects a market value of \$80,420, and the board of review's assessment analysis determined that the subject's pro rata share of the ownership of the building was \$78,866. The Board gave less weight to the board of review's estimate of the subject's market value. The board of review relied on three sales that occurred in April and December 2008, which was over six years prior to the January 1, 2015 assessment date. The Board gave more weight to the appellant's estimate of market value. The appellant's attorney relied on two sales that occurred in November 2013 and July 2014 to arrive at an estimated market value of \$23,908. The Board finds the sale dates relied on by the appellant were more proximate to the assessment date at issue. Based on this record, the Board finds the appellant was able to demonstrate that the subject was overvalued and a reduction in the subject's assessment is 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.

PARTIES OF RECORD

AGENCY

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Brenda Tribble, by attorney:
David C. Dunkin
Arnstein & Lehr, LLP
161 North Clark
Suite 4200
Chicago, IL 60601

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602