



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

APPELLANT: PanAsia Partners Group, LLC  
DOCKET NO.: 15-33087.001-R-1  
PARCEL NO.: 14-33-102-027-0000

The parties of record before the Property Tax Appeal Board are PanAsia Partners Group, LLC, 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:

**LAND:** \$29,160  
**IMPR.:** \$99,344  
**TOTAL:** \$128,504

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 three-story multi-family building of frame construction with 4,595 square feet of living area. The building is approximately 127 years old. Features of the property include a full basement finished with an apartment and a 2½-car detached garage. The subject building has five units and is located on a 3,240-square foot site in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-11 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 five equity comparables improved with three-story multi-family buildings of masonry construction that range in size from 4,404 to 4,522 square feet of living area. The buildings range in age from 105 to 127 years old. Four comparables have full unfinished basements and two comparables have two-car detached

garages. These properties have improvement assessments that range from \$85,430 to \$95,956 or from \$19.28 to \$21.27 per square foot of living area. Based on this evidence the appellant requested the subject's improvement assessment be reduced to \$88,591 or \$19.28 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$128,504. The subject property has an improvement assessment of \$99,344 or \$21.62 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables improved with one, two-story multi-family building and three, three-story multi-family buildings of masonry construction that range in size from 4,076 to 4,488 square feet of living area. The comparables are either 106 or 127 years old. Each comparable has a full or partial basement with one having an apartment and two having recreation rooms. Three comparables have central air conditioning and two comparables have a 2-car or a 2.5-car garage. The comparables have improvement assessments that range from \$88,653 to \$98,016 or from \$21.75 to \$21.87 per square foot of living area.

### **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 submitted information on nine comparables to support their respective positions. The Board gives less weight to appellant's comparable #1 due to the lack of a basement. The Board gives less weight to board of review comparable #1 due to the building's two-story design, which differs from the subject's three-story design. The remaining comparables submitted by the parties were relatively similar to the subject with the exception each was of masonry construction while the subject property was of frame construction. Additionally, the appellant's comparables have unfinished basements while the subject has a full basement finished with an apartment, which would require an upward adjustment to the comparables. Furthermore, appellant's comparables #4 and #5 as well as board of review comparable #3 have no garages, which would require an upward adjustment to the comparables. The best comparables have improvement assessments that range from \$19.28 to \$21.87 per square foot of living area. The subject's improvement assessment of \$21.62 per square foot of living area falls within the range established by the best comparables in this record and is well supported considering the differing features. 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



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: April 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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