



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

APPELLANT: 2401 W. Winnemac Condo Assn
DOCKET NO.: 16-38292.001-R-1 through 16-38292.008-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 2401 W. Winnemac Condo Assn, the appellant(s), by attorney Noah J. Schmidt, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
16-38292.001-R-1	13-12-411-128-1001	786	35,877	\$36,663
16-38292.002-R-1	13-12-411-128-1002	873	39,853	\$40,726
16-38292.003-R-1	13-12-411-128-1003	902	41,178	\$42,080
16-38292.004-R-1	13-12-411-128-1004	980	44,701	\$45,681
16-38292.005-R-1	13-12-411-128-1005	786	35,877	\$36,663
16-38292.006-R-1	13-12-411-128-1006	873	39,853	\$40,726
16-38292.007-R-1	13-12-411-128-1007	902	41,178	\$42,080
16-38292.008-R-1	13-12-411-128-1008	980	44,701	\$45,681

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 2016 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 two-year-old, eight-unit residential condominium building. The property has a 3,375 square foot site and is located in Jefferson Township, Cook County. The subject is classified as a class 2 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 that each of the subject units sold in April, 2015 for prices of \$400,000, \$455,000, \$465,000, \$515,000, \$402,000, \$450,000, and \$517,500, respectively. The appellant also included a reduction of 15% for personal property and requested an adjustment based on 9.34% level of assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's total assessment of \$330,300, which reflects a market value of \$3,303,000.

In support of its contention of the correct assessment the board of review submitted an analysis estimating the market value of the subject property based on the 2015 sale of all of the subject units. Based on the percentage of ownership of the units that sold, the board of review found the full market value of the entire building \$3,670,000. The board of review also submitted a brief arguing that the appellant did not provide a proper Illinois Department of Revenue Sales-Ratio Study and appellant's evidence of the median level of assessment was incorrect because it wasn't for the 2016 lien year at issue.

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 finds the best evidence of market value to be the sales of the subject units in April, 2015. The Board gives no weight to the appellant's adjustment for personal property as there is no evidence of this in the record. Applying the percentage of ownership for the units sold yields a value for the building as a whole of \$3,670,000 and a value for the units under appeal of \$407,370, \$452,511, \$467,558, \$507,561, \$407,370, \$452,511, \$467,558, and \$507,561, respectively. Based on this record the Board finds the subject units sold for values above the board of review's market values currently reflected by the assessments and a reduction 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: September 15, 2020



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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