



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

APPELLANT: Caleb Bryant  
DOCKET NO.: 16-43602.001-R-1  
PARCEL NO.: 16-01-407-047-1002

The parties of record before the Property Tax Appeal Board are Caleb Bryant, the appellant(s), by attorney Jessica Hill-Magiera, Attorney at Law in Lake Zurich; 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:

**LAND:** \$3,074  
**IMPR.:** \$38,426  
**TOTAL:** \$41,500

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 is a residential condominium unit contained in a nine year-old, three-story residential condominium building of masonry construction. The subject owns 23.79% of the common elements. Each condominium unit is designated by a different Property Index Number (PIN). The subject is identified by PIN 1002. The property has a 5,743 square foot site in Chicago, West Chicago Township, Cook County. It is a Class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on six suggested comparable sales, two of which are in the same building as the subject. These two units are PINs 1004 and 1005. PIN 1004 owns 12.61% of the

common elements and sold in 2015 for \$295,000. PIN 1005 owns 12.55% of the common elements and sold in 2015 for \$355,000. The appellant also submitted a copy of the Board's 2015 decision about the subject.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$50,920. The subject's assessment reflects a market value of \$509,200 when applying the 2016 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment, the board of review submitted a condominium analysis with information on suggested comparable sales for three units in the building. PIN 1001 owns 25.90% of the common elements and sold in 2014 for \$415,000; PIN 1005 (the same unit cited by the appellant as appellant's comparable #2) owns 12.55% of the common elements and sold in 2015 for \$355,000; PIN 1006 owns 12.63% of the common elements and sold in 2014 for \$312,000. These units sold for a total consideration of \$1,082,000. The units sold consisted of 51.08% of the common elements of the building. The result was a full value of the property at \$2,118,245.

In rebuttal, the appellant reaffirmed the request for an assessment reduction.

#### **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 the best evidence of market value to be the 2014 sale of PIN 1001, cited as the board of review's comparable #1. The other comparable properties cited by the appellant are given less weight because they differ in age, location and/or common elements ownership than the subject. PIN 101 is most similar with the subject in common elements ownership and is in the same building as the subject. PIN 1001 sold in 2014 for \$415,000. The subject's total assessment is above the market value of the best evidence of recent sales in the record. Based on this evidence, the Board finds 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

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: May 26, 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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