

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:Metropolitan Square Condo Assoc.DOCKET NO.:16-44138.001-R-2 through 16-44138.142-R-2PARCEL NO.:See Below

The parties of record before the Property Tax Appeal Board are Metropolitan Square Condo Assoc., the appellant(s), by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds <u>No Change</u> 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 |
|------------------|--------------------|------|---------|----------|
| 16-44138.001-R-2 | 09-17-415-043-1001 | 323 | 20,220 | \$20,543 |
| 16-44138.002-R-2 | 09-17-415-043-1002 | 325 | 20,371 | \$20,696 |
| 16-44138.003-R-2 | 09-17-415-043-1003 | 266 | 16,699 | \$16,965 |
| 16-44138.004-R-2 | 09-17-415-043-1004 | 274 | 17,152 | \$17,426 |
| 16-44138.005-R-2 | 09-17-415-043-1005 | 240 | 15,057 | \$15,297 |
| 16-44138.006-R-2 | 09-17-415-043-1006 | 172 | 10,823 | \$10,995 |
| 16-44138.007-R-2 | 09-17-415-043-1007 | 240 | 15,057 | \$15,297 |
| 16-44138.008-R-2 | 09-17-415-043-1008 | 176 | 11,017 | \$11,193 |
| 16-44138.009-R-2 | 09-17-415-043-1009 | 181 | 11,384 | \$11,565 |
| 16-44138.010-R-2 | 09-17-415-043-1010 | 177 | 11,082 | \$11,259 |
| 16-44138.011-R-2 | 09-17-415-043-1011 | 242 | 15,186 | \$15,428 |
| 16-44138.012-R-2 | 09-17-415-043-1012 | 292 | 18,276 | \$18,568 |
| 16-44138.013-R-2 | 09-17-415-043-1013 | 323 | 20,220 | \$20,543 |
| 16-44138.014-R-2 | 09-17-415-043-1014 | 325 | 20,371 | \$20,696 |
| 16-44138.015-R-2 | 09-17-415-043-1015 | 266 | 16,699 | \$16,965 |
| 16-44138.016-R-2 | 09-17-415-043-1016 | 274 | 17,151 | \$17,425 |
| 16-44138.017-R-2 | 09-17-415-043-1017 | 240 | 15,056 | \$15,296 |
| 16-44138.018-R-2 | 09-17-415-043-1018 | 172 | 10,823 | \$10,995 |
| 16-44138.019-R-2 | 09-17-415-043-1019 | 240 | 15,057 | \$15,297 |
| 16-44138.020-R-2 | 09-17-415-043-1020 | 176 | 11,016 | \$11,192 |
| 16-44138.021-R-2 | 09-17-415-043-1021 | 181 | 11,384 | \$11,565 |
| 16-44138.022-R-2 | 09-17-415-043-1022 | 177 | 11,081 | \$11,258 |
| 16-44138.023-R-2 | 09-17-415-043-1023 | 242 | 15,186 | \$15,428 |
| 16-44138.024-R-2 | 09-17-415-043-1024 | 292 | 18,275 | \$18,567 |
| 16-44138.025-R-2 | 09-17-415-043-1025 | 323 | 20,219 | \$20,542 |

| 16-44138.026-R-2 | 09-17-415-043-1026 | 325 | 20,370 | \$20,695 |
|------------------|--------------------|-----|--------|----------|
| 16-44138.027-R-2 | 09-17-415-043-1027 | 266 | 16,698 | \$16,964 |
| 16-44138.028-R-2 | 09-17-415-043-1028 | 274 | 17,789 | \$18,063 |
| 16-44138.029-R-2 | 09-17-415-043-1029 | 240 | 15,056 | \$15,296 |
| 16-44138.030-R-2 | 09-17-415-043-1030 | 172 | 10,822 | \$10,994 |
| 16-44138.031-R-2 | 09-17-415-043-1031 | 240 | 15,056 | \$15,296 |
| 16-44138.032-R-2 | 09-17-415-043-1032 | 172 | 10,822 | \$10,994 |
| 16-44138.033-R-2 | 09-17-415-043-1033 | 181 | 11,384 | \$11,565 |
| 16-44138.034-R-2 | 09-17-415-043-1034 | 177 | 11,081 | \$11,258 |
| 16-44138.035-R-2 | 09-17-415-043-1035 | 242 | 15,186 | \$15,428 |
| 16-44138.036-R-2 | 09-17-415-043-1036 | 292 | 18,275 | \$18,567 |
| 16-44138.037-R-2 | 09-17-415-043-1037 | 323 | 20,219 | \$20,542 |
| 16-44138.038-R-2 | 09-17-415-043-1038 | 325 | 20,370 | \$20,695 |
| 16-44138.039-R-2 | 09-17-415-043-1039 | 266 | 16,698 | \$16,964 |
| 16-44138.040-R-2 | 09-17-415-043-1040 | 274 | 17,151 | \$17,425 |
| 16-44138.041-R-2 | 09-17-415-043-1041 | 240 | 15,056 | \$15,296 |
| 16-44138.042-R-2 | 09-17-415-043-1042 | 172 | 10,822 | \$10,994 |
| 16-44138.043-R-2 | 09-17-415-043-1043 | 240 | 15,056 | \$15,296 |
| 16-44138.044-R-2 | 09-17-415-043-1044 | 176 | 11,016 | \$11,192 |
| 16-44138.045-R-2 | 09-17-415-043-1045 | 181 | 11,384 | \$11,565 |
| 16-44138.046-R-2 | 09-17-415-043-1046 | 177 | 11,081 | \$11,258 |
| 16-44138.047-R-2 | 09-17-415-043-1047 | 242 | 15,186 | \$15,428 |
| 16-44138.048-R-2 | 09-17-415-043-1048 | 292 | 18,275 | \$18,567 |
| 16-44138.049-R-2 | 09-17-415-043-1049 | 323 | 20,219 | \$20,542 |
| 16-44138.050-R-2 | 09-17-415-043-1050 | 325 | 20,370 | \$20,695 |
| 16-44138.051-R-2 | 09-17-415-043-1051 | 266 | 16,698 | \$16,964 |
| 16-44138.052-R-2 | 09-17-415-043-1052 | 274 | 17,151 | \$17,425 |
| 16-44138.053-R-2 | 09-17-415-043-1053 | 240 | 15,056 | \$15,296 |
| 16-44138.054-R-2 | 09-17-415-043-1054 | 172 | 10,822 | \$10,994 |
| 16-44138.055-R-2 | 09-17-415-043-1055 | 240 | 15,056 | \$15,296 |
| 16-44138.056-R-2 | 09-17-415-043-1056 | 176 | 11,016 | \$11,192 |
| 16-44138.057-R-2 | 09-17-415-043-1057 | 181 | 11,384 | \$11,565 |
| 16-44138.058-R-2 | 09-17-415-043-1058 | 177 | 11,081 | \$11,258 |
| 16-44138.059-R-2 | 09-17-415-043-1059 | 242 | 15,186 | \$15,428 |
| 16-44138.060-R-2 | 09-17-415-043-1060 | 292 | 18,275 | \$18,567 |
| 16-44138.061-R-2 | 09-17-415-043-1061 | 323 | 20,219 | \$20,542 |
| 16-44138.062-R-2 | 09-17-415-043-1062 | 515 | 32,273 | \$32,788 |
| 16-44138.063-R-2 | 09-17-415-043-1063 | 266 | 16,698 | \$16,964 |
| 16-44138.064-R-2 | 09-17-415-043-1064 | 274 | 17,151 | \$17,425 |
| 16-44138.065-R-2 | 09-17-415-043-1065 | 240 | 15,056 | \$15,296 |
| 16-44138.066-R-2 | 09-17-415-043-1066 | 172 | 10,822 | \$10,994 |
| 16-44138.067-R-2 | 09-17-415-043-1067 | 240 | 15,056 | \$15,296 |
| 16-44138.068-R-2 | 09-17-415-043-1068 | 172 | 10,822 | \$10,994 |
| 16-44138.069-R-2 | 09-17-415-043-1069 | 181 | 11,384 | \$11,565 |
| 16-44138.070-R-2 | 09-17-415-043-1070 | 177 | 11,081 | \$11,258 |

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|------------------|--------------------|-----|--------|----------|
| 16-44138.071-R-2 | 09-17-415-043-1071 | 242 | 15,186 | \$15,428 |
| 16-44138.072-R-2 | 09-17-415-043-1072 | 292 | 18,275 | \$18,567 |
| 16-44138.073-R-2 | 09-17-415-043-1073 | 275 | 17,259 | \$17,534 |
| 16-44138.074-R-2 | 09-17-415-043-1074 | 189 | 11,880 | \$12,069 |
| 16-44138.075-R-2 | 09-17-415-043-1075 | 189 | 11,880 | \$12,069 |
| 16-44138.076-R-2 | 09-17-415-043-1076 | 263 | 16,460 | \$16,723 |
| 16-44138.077-R-2 | 09-17-415-043-1077 | 189 | 11,880 | \$12,069 |
| 16-44138.078-R-2 | 09-17-415-043-1078 | 189 | 11,880 | \$12,069 |
| 16-44138.079-R-2 | 09-17-415-043-1079 | 271 | 16,957 | \$17,228 |
| 16-44138.080-R-2 | 09-17-415-043-1080 | 289 | 18,123 | \$18,412 |
| 16-44138.081-R-2 | 09-17-415-043-1081 | 209 | 13,090 | \$13,299 |
| 16-44138.082-R-2 | 09-17-415-043-1082 | 204 | 12,766 | \$12,970 |
| 16-44138.083-R-2 | 09-17-415-043-1083 | 281 | 17,627 | \$17,908 |
| 16-44138.084-R-2 | 09-17-415-043-1084 | 204 | 12,766 | \$12,970 |
| 16-44138.085-R-2 | 09-17-415-043-1085 | 209 | 13,090 | \$13,299 |
| 16-44138.086-R-2 | 09-17-415-043-1086 | 316 | 19,787 | \$20,103 |
| 16-44138.087-R-2 | 09-17-415-043-1087 | 283 | 17,735 | \$18,018 |
| 16-44138.088-R-2 | 09-17-415-043-1088 | 189 | 11,880 | \$12,069 |
| 16-44138.089-R-2 | 09-17-415-043-1089 | 189 | 11,880 | \$12,069 |
| 16-44138.090-R-2 | 09-17-415-043-1090 | 263 | 16,460 | \$16,723 |
| 16-44138.091-R-2 | 09-17-415-043-1091 | 189 | 11,880 | \$12,069 |
| 16-44138.092-R-2 | 09-17-415-043-1092 | 189 | 11,880 | \$12,069 |
| 16-44138.093-R-2 | 09-17-415-043-1093 | 271 | 16,957 | \$17,228 |
| 16-44138.094-R-2 | 09-17-415-043-1094 | 297 | 18,599 | \$18,896 |
| 16-44138.095-R-2 | 09-17-415-043-1095 | 221 | 13,889 | \$14,110 |
| 16-44138.096-R-2 | 09-17-415-043-1096 | 216 | 13,544 | \$13,760 |
| 16-44138.097-R-2 | 09-17-415-043-1097 | 285 | 17,886 | \$18,171 |
| 16-44138.098-R-2 | 09-17-415-043-1098 | 216 | 13,544 | \$13,760 |
| 16-44138.099-R-2 | 09-17-415-043-1099 | 221 | 13,889 | \$14,110 |
| 16-44138.100-R-2 | 09-17-415-043-1100 | 320 | 20,046 | \$20,366 |
| 16-44138.101-R-2 | 09-17-415-043-1101 | 283 | 17,735 | \$18,018 |
| 16-44138.102-R-2 | 09-17-415-043-1102 | 189 | 11,880 | \$12,069 |
| 16-44138.103-R-2 | 09-17-415-043-1103 | 189 | 11,880 | \$12,069 |
| 16-44138.104-R-2 | 09-17-415-043-1104 | 263 | 16,460 | \$16,723 |
| 16-44138.105-R-2 | 09-17-415-043-1105 | 189 | 11,880 | \$12,069 |
| 16-44138.106-R-2 | 09-17-415-043-1106 | 189 | 11,880 | \$12,069 |
| 16-44138.107-R-2 | 09-17-415-043-1107 | 271 | 16,957 | \$17,228 |
| 16-44138.108-R-2 | 09-17-415-043-1108 | 297 | 18,599 | \$18,896 |
| 16-44138.109-R-2 | 09-17-415-043-1109 | 221 | 13,889 | \$14,110 |
| 16-44138.110-R-2 | 09-17-415-043-1110 | 216 | 13,540 | \$13,756 |
| 16-44138.111-R-2 | 09-17-415-043-1111 | 285 | 17,886 | \$18,171 |
| 16-44138.112-R-2 | 09-17-415-043-1112 | 216 | 13,544 | \$13,760 |
| 16-44138.113-R-2 | 09-17-415-043-1113 | 221 | 13,889 | \$14,110 |
| 16-44138.114-R-2 | 09-17-415-043-1114 | 320 | 20,046 | \$20,366 |
| 16-44138.115-R-2 | 09-17-415-043-1115 | 283 | 17,735 | \$18,018 |

| 16-44138.116-R-2 | 09-17-415-043-1116 | 189 | 11,880 | \$12,069 |
|------------------|--------------------|-----|--------|----------|
| 16-44138.117-R-2 | 09-17-415-043-1117 | 189 | 11,880 | \$12,069 |
| 16-44138.118-R-2 | 09-17-415-043-1118 | 263 | 16,460 | \$16,723 |
| 16-44138.119-R-2 | 09-17-415-043-1119 | 189 | 11,880 | \$12,069 |
| 16-44138.120-R-2 | 09-17-415-043-1120 | 189 | 11,880 | \$12,069 |
| 16-44138.121-R-2 | 09-17-415-043-1121 | 271 | 16,957 | \$17,228 |
| 16-44138.122-R-2 | 09-17-415-043-1122 | 297 | 18,599 | \$18,896 |
| 16-44138.123-R-2 | 09-17-415-043-1123 | 221 | 13,889 | \$14,110 |
| 16-44138.124-R-2 | 09-17-415-043-1124 | 216 | 13,544 | \$13,760 |
| 16-44138.125-R-2 | 09-17-415-043-1125 | 285 | 17,886 | \$18,171 |
| 16-44138.126-R-2 | 09-17-415-043-1126 | 216 | 13,544 | \$13,760 |
| 16-44138.127-R-2 | 09-17-415-043-1127 | 221 | 13,889 | \$14,110 |
| 16-44138.128-R-2 | 09-17-415-043-1128 | 320 | 20,046 | \$20,366 |
| 16-44138.129-R-2 | 09-17-415-043-1129 | 283 | 17,735 | \$18,018 |
| 16-44138.130-R-2 | 09-17-415-043-1130 | 189 | 11,880 | \$12,069 |
| 16-44138.131-R-2 | 09-17-415-043-1131 | 189 | 11,880 | \$12,069 |
| 16-44138.132-R-2 | 09-17-415-043-1132 | 263 | 16,460 | \$16,723 |
| 16-44138.133-R-2 | 09-17-415-043-1133 | 189 | 11,880 | \$12,069 |
| 16-44138.134-R-2 | 09-17-415-043-1134 | 189 | 11,880 | \$12,069 |
| 16-44138.135-R-2 | 09-17-415-043-1135 | 271 | 16,957 | \$17,228 |
| 16-44138.136-R-2 | 09-17-415-043-1136 | 297 | 18,599 | \$18,896 |
| 16-44138.137-R-2 | 09-17-415-043-1137 | 221 | 13,889 | \$14,110 |
| 16-44138.138-R-2 | 09-17-415-043-1138 | 216 | 13,544 | \$13,760 |
| 16-44138.139-R-2 | 09-17-415-043-1139 | 285 | 17,886 | \$18,171 |
| 16-44138.140-R-2 | 09-17-415-043-1140 | 216 | 13,544 | \$13,760 |
| 16-44138.141-R-2 | 09-17-415-043-1141 | 221 | 13,889 | \$14,110 |
| 16-44138.142-R-2 | 09-17-415-043-1142 | 457 | 28,644 | \$29,101 |

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 142-unit residential condominium. It is 14 years old and is situated on a 60,043 square foot site in Maine 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 various units in the subject building sold from 2012 through 2016.

The appellant made a personal property deduction to each sale price and divided the total of the adjusted sale prices by the total percentage of ownership of the sales to determine the subject's market value a whole of \$19,474,560, or an assessment of \$1,947,450 when using the 2016 level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. 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 of \$2,193,651. The subject's assessment reflects a market value of \$21,936,510, land included, when using the 2016 level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of this argument the board of review submitted evidence disclosing various units in the subject building were sold from 2013 through 2016. The board used the total of the recent sale prices to determine the subject's market value as a whole of \$24,945,118, or an assessment of \$2,494,512 when using the 2016 level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 29 sales submitted by the parties that occurred from 2014 through 2016. The Board did not use a personal property deduction as no evidence regarding personal property was submitted. The total of the sale prices is \$4,912,750 and the total percentage of ownership is 20.156%. When the total purchase price is divided by the total percentage of units sold, the result is a market value for the condominium as a whole of \$24,373,636, or an assessment of \$2,437,364 when using the 2016 level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance, which is above the subject's current assessment of \$2,193,651. 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

<u>CERTIFICATION</u>

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:

DISSENTING:

March 16, 2021

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 <u>PETITION AND</u> <u>EVIDENCE</u> 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

Metropolitan Square Condo Assoc., by attorney: George N. Reveliotis Reveliotis Law, P.C. 1030 Higgins Road Suite 101 Park Ridge, IL 60068

COUNTY

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