



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

APPELLANT: Chun Cham  
DOCKET NO.: 17-21003.001-R-1  
PARCEL NO.: 16-07-128-034-1015

The parties of record before the Property Tax Appeal Board are Chun Cham, the appellant(s); 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:** \$525  
**IMPR.:** \$9,019  
**TOTAL:** \$9,544

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 2017 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 condominium unit within a 99-year old, multi-story, 26-unit condominium building. The property is located in Oak Park Township, Cook County and 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 the overvaluation argument, the appellant submitted information on the sale of four units with two units located within the subject's building and two units located in buildings two blocks away. These units sold from April 2015 to October 2016 for prices ranging from \$67,000 to \$109,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$11,201. The subject's assessment reflects a market value of

\$112,010 when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a grid listing all the units within the subject's building and information on two sales of units within the subject's building. These units sold in February and December 2015 for prices of \$109,000 and \$169,000. These sales total \$278,000. The board adjusted the sales down by 5% for an adjusted value of \$264,100. The board of review then applies the percentage of ownership of these sales of 7.9044% to arrive at a total value of the building of \$3,341,177. Multiplying this value by the subject's percentage of ownerships of 3.3527% arrives at a value for the subject of \$112,020. The board of review's comparable #2 is also used by the appellant as comparable #2.

In rebuttal, the appellant submitted a letter addressing the board of review's evidence and arguing that some of the units within the subject range in condition from original interior to completely rehabbed. The appellant did not provide any interior photographs of the comparables. The appellant then prepared an analysis similar to the board of review's analysis to request a reduction to \$7,797. The appellant also requests his remaining two comparables also be reviewed.

### **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 best evidence of market value to be the appellant's comparables #1 and #2 and the board of review's comparables #1 and #2. These three comparables sold from April 2015 to October 2016 for prices ranging from \$67,000 to \$169,000 for a total value of \$345,000. The subject's assessment reflects a market value within this range of \$112,010. The Board finds there is no evidence to support the adjustment factor used by the board of review. When the percentage of ownership of the units sold of 12.1195% is applied to the total sale price of \$345,000, the value of the building as a whole is \$2,846,652. Applying the subject's percentage of ownership of 3.3527% estimates a market value for of the subject of \$95,440 which is below the market value of the subject based on the assessment. Therefore, the Board finds the appellant showed by a preponderance of the evidence that the subject property was overvalued, and a reduction 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: February 13, 2019



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

Chun Cham  
949 Lake St C2  
Oak Park, IL 60301

COUNTY

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