

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: 600 East Condominium Association

DOCKET NO.: 17-24514.001-R-1 through 17-24514.041-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 600 East Condominium Association, 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>A Reduction</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
17-24514.001-R-1	02-33-201-033-1001	428	6,835	\$ 7,263
17-24514.002-R-1	02-33-201-033-1002	387	6,179	\$ 6,566
17-24514.003-R-1	02-33-201-033-1003	363	5,801	\$ 6,164
17-24514.004-R-1	02-33-201-033-1004	368	5,876	\$ 6,244
17-24514.005-R-1	02-33-201-033-1005	281	4,489	\$ 4,770
17-24514.006-R-1	02-33-201-033-1006	361	5,776	\$ 6,137
17-24514.007-R-1	02-33-201-033-1007	341	5,448	\$ 5,789
17-24514.008-R-1	02-33-201-033-1008	281	4,489	\$ 4,770
17-24514.009-R-1	02-33-201-033-1009	368	5,876	\$ 6,244
17-24514.010-R-1	02-33-201-033-1010	361	5,776	\$ 6,137
17-24514.011-R-1	02-33-201-033-1011	387	6,179	\$ 6,566
17-24514.012-R-1	02-33-201-033-1012	379	6,053	\$ 6,432
17-24514.013-R-1	02-33-201-033-1013	379	6,053	\$ 6,432
17-24514.014-R-1	02-33-201-033-1014	428	6,835	\$ 7,263
17-24514.015-R-1	02-33-201-033-1015	434	6,936	\$ 7,370
17-24514.016-R-1	02-33-201-033-1016	379	6,053	\$ 6,432
17-24514.017-R-1	02-33-201-033-1017	379	6,053	\$ 6,432
17-24514.018-R-1	02-33-201-033-1018	385	6,154	\$ 6,539
17-24514.019-R-1	02-33-201-033-1019	268	4,288	\$ 4,556
17-24514.020-R-1	02-33-201-033-1020	385	6,154	\$ 6,539
17-24514.021-R-1	02-33-201-033-1021	353	5,650	\$ 6,003
17-24514.022-R-1	02-33-201-033-1023	379	6,053	\$ 6,432
17-24514.023-R-1	02-33-201-033-1024	391	6,255	\$ 6,646
17-24514.024-R-1	02-33-201-033-1025	368	5,876	\$ 6,244
17-24514.025-R-1	02-33-201-033-1026	385	6,154	\$ 6,539

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17-24514.026-R-1	02-33-201-033-1027	385	6,154	\$ 6,539
17-24514.027-R-1	02-33-201-033-1028	428	6,835	\$ 7,263
17-24514.028-R-1	02-33-201-033-1029	440	7,037	\$ 7,477
17-24514.029-R-1	02-33-201-033-1030	379	6,053	\$ 6,432
17-24514.030-R-1	02-33-201-033-1031	385	6,154	\$ 6,539
17-24514.031-R-1	02-33-201-033-1032	391	6,255	\$ 6,646
17-24514.032-R-1	02-33-201-033-1033	268	4,288	\$ 4,556
17-24514.033-R-1	02-33-201-033-1034	391	6,255	\$ 6,646
17-24514.034-R-1	02-33-201-033-1035	341	5,448	\$ 5,789
17-24514.035-R-1	02-33-201-033-1036	391	6,255	\$ 6,646
17-24514.036-R-1	02-33-201-033-1037	385	6,154	\$ 6,539
17-24514.037-R-1	02-33-201-033-1038	391	6,255	\$ 6,646
17-24514.038-R-1	02-33-201-033-1039	399	6,381	\$ 6,780
17-24514.039-R-1	02-33-201-033-1040	391	6,255	\$ 6,646
17-24514.040-R-1	02-33-201-033-1041	391	6,255	\$ 6,646
17-24514.041-R-1	02-33-201-033-1042	428	6,835	\$ 7,263

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 (the "Board") finds that it has jurisdiction over the parties and the subject matter of the appeal.

### **Findings of Fact**

The subject consists of 41 condominium units with a combined 97.6% ownership interest in the common elements. The property is located in Schaumburg, Palatine Township, Cook County. The subject is classified as 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 an appraisal estimating the subject had a market value of \$2,680,000 as of January 1, 2016. The Board notes that this appraisal included the unit with the PIN ending in -1022, and that this unit is not one of the subject units in the instant appeal. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$268,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$328,304. The subject's assessment reflects a market value of \$3,283,040 when applying the 2017 statutory level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00%.

In support of the subject's assessment, the board of review submitted a memorandum showing that two of the subject units, or 3.560% of ownership, sold between October 2014 and May 2017 for \$84,400 to \$96,500. An allocation of 10.00% for personal property was subtracted from the aggregate sale price, which was then divided by the percentage of interest of the units sold to arrive at a total market value for the building of \$4,573,314.

# **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 appraisals submitted by the appellant. The subject's assessment reflects a market value above the best evidence of market value in the record. The Board finds the subject property had a market value of \$2,680,000 as of the assessment date at issue. Since market value has been established the 2017 statutory level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00% shall apply. 86 Ill.Admin.Code §1910.50(c)(2).

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.

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	Chairman
a R	Sobert Stoffen
Member	Member
Dan Dikini	Sarah Bokley
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:	November 17, 2020		
	Middle 15		
	Clerk of the Property Tax Appeal Board		

Section 16-185 of the Property Tax Code provides in part:

**IMPORTANT NOTICE** 

"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 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.

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# 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**

600 East Condominium Association, 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