



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

APPELLANT: Pine Grove Inc.
DOCKET NO.: 17-41842.001-R-1 through 17-41842.007-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Pine Grove Inc., the appellant(s), by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; 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
17-41842.001-R-1	04-35-113-018-1001	3,137	25,121	\$28,258
17-41842.002-R-1	04-35-113-018-1002	3,132	25,086	\$28,218
17-41842.003-R-1	04-35-113-018-1003	3,132	25,086	\$28,218
17-41842.004-R-1	04-35-113-018-1004	3,132	25,086	\$28,218
17-41842.005-R-1	04-35-113-018-1005	3,132	25,086	\$28,218
17-41842.006-R-1	04-35-113-018-1006	3,132	25,086	\$28,218
17-41842.007-R-1	04-35-113-018-1007	3,137	25,121	\$28,258

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 seven-unit residential condominium. The condominium is 40 years old and is situated on a 19,500 square foot site located in Northfield 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 a condominium sales analysis based on two recent sales within the subject

condominium. The recent sales totaled \$627,500 and had a combined percentage of ownership of 28.58%. The appellant deduced 15% from each sale to account for personal property. The adjusted total sale price was divided by the total percentage of recently sold units resulting in a market value for the building of \$1,866,246 and an assessment of \$186,625. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$197,606. The subject's assessment reflects a market value of \$1,976,060, land included, when using the 2017 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 condominium sales analysis using the same two recent sales as submitted by the appellant; however, the board's analysis used a personal property deduction of 10%, resulting in a fair market value of \$1,976,032, or an assessment of \$197,603. Based on this analysis, the board requested confirmation of the subject's assessment.

The appellant submitted written rebuttal.

Conclusion of Law

The Board finds no merit in the appellant's argument that the Property Tax Appeal Board should reduce the subject's 2013 assessment because the board of review reduced the subject's 2012 assessment. Section 16-180 of the Property Tax Code (Rule Section 1910.50 of the Official Rules of the Property Tax Appeal Board) states in pertinent part, "All proceedings before the Property Tax Appeal Board shall be considered de novo meaning the Board will consider only the evidence, exhibits and briefs submitted to it, and will not give any weight or consideration to prior actions by a local board of review ..." Accordingly, the Board grants no weight to the appellant's argument and finds a reduction in the subject's assessment, on this basis, is not warranted.

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 a condominium sales analysis based on the two recent sales submitted by both parties which totaled \$627,500 and had a combined percentage of ownership of 28.58%. The Board did not deduct personal property from the recent sale prices as neither party submitted evidence that personal property was included in the sales. When the total sale price is divided by the percentage of the recently sold units, the result is a market value of \$2,195,591. The subject's current assessment reflects a market value below this

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amount. 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

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 16, 2023



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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