



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

APPELLANT: Paul Vidri  
DOCKET NO.: 18-28759.001-R-1  
PARCEL NO.: 14-29-406-054-1006

The parties of record before the Property Tax Appeal Board are Paul Vidri, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC in Chicago; 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:

**LAND:** \$4,858  
**IMPR.:** \$60,563  
**TOTAL:** \$65,421

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 2018 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 single condominium unit in an 8-unit complex with 11.23998% ownership interest in the condominium.<sup>1</sup> The building is approximately 10 years old and is located in Chicago, Lakeview Township, Cook County. The subject is classified as a class 2-99 residential condominium 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 four comparable sales of condominium units within the subject's complex. The comparables reportedly sold from March 2015 to April 2017 for prices

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<sup>1</sup> No other descriptive information with regard to the subject condominium unit such as dwelling size, features, etc. was submitted into evidence by either party.

ranging from \$655,000 to \$825,000.<sup>2</sup> Appellant's counsel submitted a brief arguing that the sale prices should be adjusted downward by 5% per unit to account for personal property and associated closing costs. However, appellant's counsel did not produce the Real Estate Transfer Declaration (PTAX-203) forms associated with the sales of the comparable properties or any other evidence to support the claim for a 5% reduction. After calculating the sales ratio of the four comparable units sold, appellant's counsel applied a "10% average sales ratio" to each condominium unit.

Based on this calculation, the appellant requested the subject's total assessment be reduced to \$62,326.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$65,421. The subject's assessment reflects a market value of \$654,210 when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%.

In support of the assessment, the board of review submitted an analysis prepared by Marco Fernandez, an analyst with the Cook County Board of Review. The analyst utilized the same four comparables as the appellant, however, where one unit sold in May 2016 for a price of \$825,000 and again in August 2017 for a price of \$850,000, the board of review utilized the latter sale in its calculation. The analysis indicated the total consideration for four sales of residential units in the subject's condominium building was \$2,852,000. The analyst made no adjustments for personal property or costs associated with the sales. Dividing the total consideration by the percentage of interest of ownership in the condominium for the units that sold of 49.00% indicated a full value for the condominium property of \$5,820,408. The analyst then applied the percentage of interest the subject unit had in the condominium of 11.2400% (rounded) to arrive at a full value for the subject condominium unit of \$654,214 as is reflected by the subject's assessment of \$65,421 based on the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The taxpayer 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 analysis provided by the board of review. Although both parties utilized the same four comparable sales of units within the subject's condominium complex, the board of review's analysis incorporated the most recent sale

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<sup>2</sup> One unit which the appellant reported to have sold in May 2016 for a price of \$825,000 sold again in August 2017 for a price of \$850,000 per evidence submitted by the board of review.

of the comparable that sold twice. Furthermore, while the appellant's counsel adjusted the sale prices of each comparable by deducting an estimated 5% per unit for personal property and "other soft costs," there is no evidence in the record (such as PTAX-203 forms associated with the sales of the comparable properties) to support this adjustment. This lack of evidentiary support undermines and detracts from the accuracy of the appellant's calculations. As a result, the Board gives more weight to the board of review's calculations which determined the subject's market value to be \$654,214. The Board finds that the subject's assessment of \$65,421 is reflective of the subject's market value based on the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. Therefore, based on the evidence in the record, the Board finds that the subject unit is not overvalued and a reduction in the subject's assessment is not warranted.

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



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Member



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Member



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Member

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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 16, 2021



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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

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