



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

APPELLANT: Hazelton Condominium Association  
DOCKET NO.: 18-31330.001-R-1 through 18-31330.006-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Hazelton Condominium Association, the appellant, by attorney Kevin Fanning, of Fanning Law, 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 **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:

<b>DOCKET NO</b>	<b>PARCEL NUMBER</b>	<b>LAND</b>	<b>IMPRVMT</b>	<b>TOTAL</b>
18-31330.001-R-1	14-17-407-057-1001	5,737	34,817	\$40,554
18-31330.002-R-1	14-17-407-057-1002	5,511	33,445	\$38,956
18-31330.003-R-1	14-17-407-057-1003	5,963	36,190	\$42,153
18-31330.004-R-1	14-17-407-057-1004	5,511	33,445	\$38,956
18-31330.005-R-1	14-17-407-057-1005	5,288	32,094	\$37,382
18-31330.006-R-1	14-17-407-057-1006	5,737	34,817	\$40,554

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 six residential condominium units located in a condominium building that is approximately 107 years old. The six units' range in ownership interest in the condominium from 15.6700% to 17.6700% with a combined 100% ownership interest in the property. The property has a 6,750 square foot site and is located at 4331-4333 N. Hazel Street in Chicago, Lake View Township, Cook County. The subject is 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 information and a sales analysis regarding three of the six units that sold within the condominium. The appellant's submission identified each of the unit's parcel number (PIN) and percentage of ownership within the condominium. The sales analysis disclosed PIN ending in #1001 sold in February 2017 for \$385,000, PIN ending in #1003 sold in April 2016 for \$416,000, and PIN ending in #1005 sold in May 2016 for \$400,000. The three comparables have an aggregate sales price of \$1,201,000. The appellant deducted \$180,150 or 15% for personal property from the total consideration to arrive at a total adjusted consideration of \$1,020,850, which was divided by the 50.34% total ownership interest of the three condominium units that sold to arrive at an indicated full value for the condominium property of \$2,027,920. The analyst arrived at a total assessment for the subject condominium property of \$202,792, when applying the 10% level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance to the market value finding.

As part of the evidence, the appellant provided an "Addendum to Petition" of the requested reduction for each of the six condominium units. Based on this evidence, the appellant requested within the total assessment for the subject condominium property be reduced to \$202,792.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$240,006. The subject's assessment reflects a market value of \$2,400,060 when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The board of review submission included a listing of the six condominium units in the subject property which also identified the percentage of ownership interest and revised assessments for each of the six units under appeal within the condominium property.

In support of the assessment for the subject property, the board of review submitted a sales analysis prepared by Erica Pope, an analyst with the Cook County Board of Board of Review. The analyst provided comparable sales data on the same three comparables provided in the appellant's analysis, except the board of review utilized a sale price of \$399,900 for PIN ending in #1005. The three common comparable sales within the subject's condominium property have a total consideration of \$1,200,900. The analyst provided for a 0% adjustment factor and divided the total consideration by the 50.34% total ownership interest of the three condominium units that sold to arrive at an indicated full value for the condominium property of \$2,385,578, when applying the 10% level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance to the indicated full value resulted in a total assessment of \$238,558. 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 evidence in the record supports a reduction in the assessments of the subject's condominium units under appeal.

Each of the parties submitted a sales analysis utilizing the same three common comparable sales within the subject's condominium property, except the appellant used a sale price of \$400,000 in its analysis for PIN ending in #1005 instead of the \$399,900 sale price used in the board of review's sales analysis. The Board finds the only significant difference in the parties' sales analyses is the appellant utilized a 15% deduction for personal property which resulted in a lower total assessment for the subject condominium property of \$202,792 than the board of review that utilized a 0% adjustment factor which resulted in total assessment of \$238,558 for the subject property.

The Board finds the best evidence of the subject's market value to be the sales analysis submitted by the board of review since the appellant failed to provide any explanation to support its 15% personal property deduction adjustment factor used in its analysis. The Board finds the sales analysis prepared by the board of review resulted in a market value of \$2,385,578 for the subject condominium property. The subject's current assessment reflects a market value of \$2,400,060 which falls above the estimated market value as reflected in the sales analysis presented by the board of review. Therefore, the Board will accord each subject unit its proportional share of the total market value of the building, in accordance with each unit's percentage of ownership in the common elements. 765 ILCS 605/10.

Based upon the evidence in this record, the Board finds a reduction in the subject's six condominium units based upon the percentage of ownership interest in the subject condominium property as provided in the board of review's sales analysis is 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.



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: June 21, 2022



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

Hazelton Condominium Association, by attorney:  
Kevin Fanning  
Fanning Law, LLC  
200 N. LaSalle St.  
Suite 1550  
Chicago, IL 60601

COUNTY

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