



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

APPELLANT: Cortland Campbell
DOCKET NO.: 18-41558.001-R-1
PARCEL NO.: 29-10-423-041-1012

The parties of record before the Property Tax Appeal Board are Cortland Campbell, 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 ***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: \$405
IMPR.: \$2,108
TOTAL: \$2,513

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 located in 21-unit condominium building. The unit contains 936 square feet of living area and has a 4.7619% ownership interest in the common elements of the condominium property.¹ The property is located in Dolton, Thornton 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 information of the subject and four comparable sales located within the same building and same neighborhood code as the subject property. The appellant reported in Section V of the appeal petition that the comparables consist of condominium units that range in size from 900 to 936 square feet of living area. The comparables sold from May 2016 to February

¹ The subject's ownership interest is found in the evidence provided by the board of review.

2018 for prices ranging from \$7,000 to \$20,750. In addition, the appellant provided a printout of information on the 21 condominium units located in the subject's condominium building. The appellant reported that the units have from 2.517437% to 5.391798% ownership interest in the common elements of the condominium property. Sales data was provided for six of the units, four of which are duplicates of the sales shown in Section V of the appeal petition. The six condominium units sold from May 2016 to April 2018 for prices ranging from \$7,000 to \$29,500. The appellant's counsel asserted in the brief that based on the six sales that took place during the relevant time frame, the assessor's proposed 2018 assessment exceeds the fair market value for the subject property. Counsel stated that the condominium analysis lists the gross sale price as well as an adjusted sales price which factors in a person [sic] property allocation of 5% per unit. Furthermore, counsel asserted that other soft costs such as financing fees, attorney fees and brokerage fees are not factored into the sales price. Counsel concluded that an allocation of 5% per unit is very conservative considering the location, condition and age of this building.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$1,030, which would reflect a market value of \$10,300, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$2,920. The subject's assessment reflects a market value of \$29,200, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted a sales analysis prepared by Adam Pawlak, an analyst with the Cook County Board of Review. The analyst reported that there are 21 units in the in the subject's condominium building, each with 4.7619% ownership interest in the common elements of the condominium property. The analyst provided sales data on one comparable sale of a residential unit in the subject's condominium property, which was also included in the appellant's condominium analysis. The sale occurred in June 2018 for a price of \$29,500. The analyst applied a 1% adjustment factor to the consideration of the one sale resulting in an adjusted consideration of \$29,205. 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 appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant provided a total of six comparable sales, while the board of review provided a sales analysis based on one common comparable sale, to support their respective positions before the Property Tax Appeal Board. As an initial matter, the Board gives little weight to the subject's estimated market value as indicated in the board of review's sales analysis as the report only included one comparable sale from the subject's condominium building, when other

comparable sales in the building were available and provided by the appellant. However, the board will analyze the six comparable sales submitted by the parties.

The Board finds the best evidence of market value to be appellant's comparable sale #1 and the common sale. These comparables sold in February and April 2018 for prices of \$20,750 and \$29,500. The Board gives reduced weight to the four remaining sales in the record as their sale dates occurred less proximate in time to the assessment date at issue. The subject's assessment reflects a market value of \$29,200 which is bracketed by the two best comparable sales in the record. However, the Board finds these two comparable sales have a combined total ownership interest in the condominium property of 9.5238%. The Board also finds these comparables have an aggregate sale price of \$50,250, reflecting a total market value of \$527,626 for the condominium property. Applying the subject's percentage of ownership interest of 4.7619% to the total market value results in a market value for the subject of \$25,125. Based on this evidence, the Board finds a reduction in the subject's assessment 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:

December 21, 2021



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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