



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

APPELLANT: Aberdeen of River West
DOCKET NO.: 18-43927.001-R-1 through 18-43927.008-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Aberdeen of River West, the appellant(s), by attorney Patrick C. Turner, of Maurides Foley Tabangay & Turner LLC in Elmhurst; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
18-43927.001-R-1	17-08-247-030-1001	2,717	30,305	\$33,022
18-43927.002-R-1	17-08-247-030-1002	2,717	30,305	\$33,022
18-43927.003-R-1	17-08-247-030-1003	3,261	36,366	\$39,627
18-43927.004-R-1	17-08-247-030-1004	3,261	36,366	\$39,627
18-43927.005-R-1	17-08-247-030-1005	3,532	39,397	\$42,929
18-43927.006-R-1	17-08-247-030-1006	3,532	39,397	\$42,929
18-43927.007-R-1	17-08-247-030-1007	4,076	45,458	\$49,534
18-43927.008-R-1	17-08-247-030-1008	4,076	45,458	\$49,534

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 an eight-unit condominium building. The property has a 4,196 square foot site and is located in West Chicago Township, Cook County. The subject is classified as a class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal form indicates an inequity appeal, but the appellant submitted evidence and a brief making a market value argument. Specifically, the appellant submitted a market value analysis based on the sale of four units within the subject building that sold after 2015. Appellant's sales have a combined total of 47.00% and a market value of \$1,724,500. The appellant argued that a 10% should be deducted from the total sale to account for personal property. After making that adjustment, the appellant found the total value for the subject of \$3,302,234.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$367,336. The subject's assessment reflects a market value of \$3,673,360 when applying the 2018 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 the sales of three condominium units. No descriptive information was provided for these units. They sold from June, 2016 to July 2017 for prices ranging from \$457,000 to \$475,000. With the exception of the sale of the unit with PIN ending in -1002, board of review's suggested comparable sales are identical to the appellant's.

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 all of the appellant's comparable sales, and the board of review's comparable sales. The Board gives no weight to the deduction for personal property as there is no evidence to support this. Dividing the total sale price by the percentage of ownership of this sold unit of 47.00% arrives at a value for the building of \$3,669,149. The subject's current assessment reflects a market value of \$3,673,360 which is above the value as established by the sales. Therefore, the Board finds the appellant showed by a preponderance of the evidence that the subject property was overvalued, and a reduction is 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:

October 17, 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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APPELLANT

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