



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

APPELLANT: Michael Slovitt  
DOCKET NO.: 18-46035.001-R-1 through 18-46035.004-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Michael Slovitt, the appellant(s), by attorney James E. Doherty, of Tully & Associates, LTD. 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
18-46035.001-R-1	17-06-404-029-1001	3,895	47,559	\$51,454
18-46035.002-R-1	17-06-404-029-1002	4,363	53,282	\$57,645
18-46035.003-R-1	17-06-404-029-1003	4,363	53,282	\$57,645
18-46035.004-R-1	17-06-404-029-1004	4,543	55,482	\$60,025

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 four condominium units located within a 12-year-old, multi-story, masonry, four-unit, condominium building. The subject is located in Chicago, West Township, Cook County and is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends equity as the basis of appeal; however, the appellant submitted a brief and evidence adding the subject's market value. In support of the market value argument, the appellant included sales information on one unit within the subject's building. This property sold in 2018 for \$475,000. The appellant divided this value by this unit's percentage of ownership of

22.69% to arrive at a value for the building as a whole of \$2,093,433. The appellant then applied a 2% personal property factor to the total value to assert an “aggregate land/building” fair market value of \$2,051,564.

The board of review submitted a “Board of Review-Notes on Appeal” which disclosed the total assessment for the subject of \$226,769. The subject's assessment reflects a market value of \$2,267,690 when using the 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 information on the sale of three units within the subject’s building from 2015 to 2018 for a total amount of \$1,719,000. The board then divided this by the percentage of ownership of the unit sold of 73.53% to arrive at a value for the building of \$2,337,821. The 2018 sale was submitted by the appellant as evidence of the subject’s market value.

### **Conclusion of Law**

The taxpayer contends overvaluation as the basis of the appeal. 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 best evidence of market value to be the board of review’s evidence. Three of the four units sold for values totaling \$1,749,000. In applying the percentage of ownership of these units reflects a market value for the units of \$2,337,821. The subject’s current assessment reflects a market value that is below this value. The Board gives no weight to the appellant personal property factor as there is no evidence to support this factor. Therefore, the Board finds the appellant failed to show by a preponderance of the evidence that the subject property was overvalued, and a reduction 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: \_\_\_\_\_

July 18, 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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