

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT:Boardwalk of Park Ridge Condominium AssociationDOCKET NO.:19-31404.001-R-2 through 19-31404.138-R-2PARCEL NO.:See Below

The parties of record before the Property Tax Appeal Board are Boardwalk of Park Ridge Condominium Association, the appellant(s), by attorney Joanne Elliott, of Elliott & Associates Attorneys, PLLC in Des Plaines; the Cook County Board of Review; the Maine Twp. H.S.D. #207 intervenor, by attorney Ares G. Dalianis of Franczek P.C. in Chicago.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds <u>*A Reduction*</u> 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
19-31404.001-R-2	09-27-306-161-1001	3,723	29,190	\$32,913
19-31404.002-R-2	09-27-306-161-1002	3,893	30,527	\$34,420
19-31404.003-R-2	09-27-306-161-1003	4,404	34,531	\$38,935
19-31404.004-R-2	09-27-306-161-1004	4,292	33,656	\$37,948
19-31404.005-R-2	09-27-306-161-1007	4,858	38,093	\$42,951
19-31404.006-R-2	09-27-306-161-1008	4,260	33,400	\$37,660
19-31404.007-R-2	09-27-306-161-1009	4,858	38,093	\$42,951
19-31404.008-R-2	09-27-306-161-1010	4,858	38,093	\$42,951
19-31404.009-R-2	09-27-306-161-1011	4,858	38,093	\$42,951
19-31404.010-R-2	09-27-306-161-1012	4,260	33,400	\$37,660
19-31404.011-R-2	09-27-306-161-1013	4,260	33,400	\$37,660
19-31404.012-R-2	09-27-306-161-1014	4,858	38,093	\$42,951
19-31404.013-R-2	09-27-306-161-1015	4,858	38,093	\$42,951
19-31404.014-R-2	09-27-306-161-1016	4,858	38,093	\$42,951
19-31404.015-R-2	09-27-306-161-1017	4,858	38,093	\$42,951
19-31404.016-R-2	09-27-306-161-1019	4,858	38,093	\$42,951
19-31404.017-R-2	09-27-306-161-1020	4,858	38,093	\$42,951
19-31404.018-R-2	09-27-306-161-1021	4,260	33,400	\$37,660
19-31404.019-R-2	09-27-306-161-1022	4,260	33,400	\$37,660
19-31404.020-R-2	09-27-306-161-1023	4,260	33,400	\$37,660
19-31404.021-R-2	09-27-306-161-1024	4,260	33,400	\$37,660
19-31404.022-R-2	09-27-306-161-1025	4,858	38,093	\$42,951
19-31404.023-R-2	09-27-306-161-1026	4,858	38,093	\$42,951
19-31404.024-R-2	09-27-306-161-1027	4,260	33,400	\$37,660

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19-31404.025-R-2	09-27-306-161-1028	4,260	33,400	\$37,660
19-31404.026-R-2	09-27-306-161-1029	4,260	33,400	\$37,660
19-31404.027-R-2	09-27-306-161-1030	4,260	33,400	\$37,660
19-31404.028-R-2	09-27-306-161-1031	4,260	33,400	\$37,660
19-31404.029-R-2	09-27-306-161-1032	2,730	21,406	\$24,136
19-31404.030-R-2	09-27-306-161-1033	2,730	21,406	\$24,136
19-31404.031-R-2	09-27-306-161-1034	2,730	21,406	\$24,136
19-31404.032-R-2	09-27-306-161-1035	2,730	21,406	\$24,136
19-31404.033-R-2	09-27-306-161-1036	2,730	21,406	\$24,136
19-31404.034-R-2	09-27-306-161-1037	2,730	21,406	\$24,136
19-31404.035-R-2	09-27-306-161-1038	2,730	21,406	\$24,136
19-31404.036-R-2	09-27-306-161-1039	2,730	21,406	\$24,136
19-31404.037-R-2	09-27-306-161-1040	2,730	21,406	\$24,136
19-31404.038-R-2	09-27-306-161-1041	2,730	21,406	\$24,136
19-31404.039-R-2	09-27-306-161-1042	2,730	21,406	\$24,136
19-31404.040-R-2	09-27-306-161-1043	2,730	21,406	\$24,136
19-31404.041-R-2	09-27-306-161-1044	316	2,481	\$2,797
19-31404.042-R-2	09-27-306-161-1045	316	2,481	\$2,797
19-31404.043-R-2	09-27-306-161-1046	316	2,481	\$2,797
19-31404.044-R-2	09-27-306-161-1047	316	2,481	\$2,797
19-31404.045-R-2	09-27-306-161-1048	316	2,481	\$2,797
19-31404.046-R-2	09-27-306-161-1049	316	2,481	\$2,797
19-31404.047-R-2	09-27-306-161-1050	316	2,481	\$2,797
19-31404.048-R-2	09-27-306-161-1051	316	2,481	\$2,797
19-31404.049-R-2	09-27-306-161-1052	316	2,481	\$2,797
19-31404.050-R-2	09-27-306-161-1053	316	2,481	\$2,797
19-31404.051-R-2	09-27-306-161-1054	316	2,481	\$2,797
19-31404.052-R-2	09-27-306-161-1055	316	2,481	\$2,797
19-31404.053-R-2	09-27-306-161-1056	316	2,481	\$2,797
19-31404.054-R-2	09-27-306-161-1057	316	2,481	\$2,797
19-31404.055-R-2	09-27-306-161-1058	316	2,481	\$2,797
19-31404.056-R-2	09-27-306-161-1059	316	2,481	\$2,797
19-31404.057-R-2	09-27-306-161-1060	316	2,481	\$2,797
19-31404.058-R-2	09-27-306-161-1061	316	2,481	\$2,797
19-31404.059-R-2	09-27-306-161-1062	316	2,481	\$2,797
19-31404.060-R-2	09-27-306-161-1063	4,260	33,400	\$37,660
19-31404.061-R-2	09-27-306-161-1064	4,260	33,400	\$37,660
19-31404.062-R-2	09-27-306-161-1065	4,260	33,400	\$37,660
19-31404.063-R-2	09-27-306-161-1066	4,260	33,400	\$37,660
19-31404.064-R-2	09-27-306-161-1067	4,858	38,093	\$42,951
19-31404.065-R-2	09-27-306-161-1068	4,858	38,093	\$42,951
19-31404.066-R-2	09-27-306-161-1069	4,858	38,093	\$42,951
19-31404.067-R-2	09-27-306-161-1070	4,260	33,400	\$37,660
19-31404.068-R-2	09-27-306-161-1071	4,260	33,400	\$37,660
19-31404.069-R-2	09-27-306-161-1072	4,260	33,400	\$37,660
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19-31404.070-R-2	09-27-306-161-1073	4,260	33,400	\$37,660
19-31404.071-R-2	09-27-306-161-1074	4,260	33,400	\$37,660
19-31404.072-R-2	09-27-306-161-1075	4,260	33,400	\$37,660
19-31404.073-R-2	09-27-306-161-1076	4,260	33,400	\$37,660
19-31404.074-R-2	09-27-306-161-1077	4,260	33,400	\$37,660
19-31404.075-R-2	09-27-306-161-1078	4,260	33,400	\$37,660
19-31404.076-R-2	09-27-306-161-1079	4,260	33,400	\$37,660
19-31404.077-R-2	09-27-306-161-1080	4,260	33,400	\$37,660
19-31404.078-R-2	09-27-306-161-1081	2,730	21,406	\$24,136
19-31404.079-R-2	09-27-306-161-1082	2,730	21,406	\$24,136
19-31404.080-R-2	09-27-306-161-1083	2,730	21,406	\$24,136
19-31404.081-R-2	09-27-306-161-1084	2,730	21,406	\$24,136
19-31404.082-R-2	09-27-306-161-1085	2,730	21,406	\$24,136
19-31404.083-R-2	09-27-306-161-1086	2,730	21,406	\$24,136
19-31404.084-R-2	09-27-306-161-1087	2,730	21,406	\$24,136
19-31404.085-R-2	09-27-306-161-1088	2,730	21,406	\$24,136
19-31404.086-R-2	09-27-306-161-1089	2,730	21,406	\$24,136
19-31404.087-R-2	09-27-306-161-1090	2,730	21,406	\$24,136
19-31404.088-R-2	09-27-306-161-1091	2,730	21,406	\$24,136
19-31404.089-R-2	09-27-306-161-1092	2,730	21,406	\$24,136
19-31404.090-R-2	09-27-306-161-1093	316	2,481	\$2,797
19-31404.091-R-2	09-27-306-161-1094	316	2,481	\$2,797
19-31404.092-R-2	09-27-306-161-1095	316	2,481	\$2,797
19-31404.093-R-2	09-27-306-161-1096	316	2,481	\$2,797
19-31404.094-R-2	09-27-306-161-1097	316	2,481	\$2,797
19-31404.095-R-2	09-27-306-161-1098	316	2,481	\$2,797
19-31404.096-R-2	09-27-306-161-1099	316	2,481	\$2,797
19-31404.097-R-2	09-27-306-161-1100	316	2,481	\$2,797
19-31404.098-R-2	09-27-306-161-1101	316	2,481	\$2,797
19-31404.099-R-2	09-27-306-161-1102	316	2,481	\$2,797
19-31404.100-R-2	09-27-306-161-1103	316	2,481	\$2,797
19-31404.101-R-2	09-27-306-161-1104	316	2,481	\$2,797
19-31404.102-R-2	09-27-306-161-1105	316	2,481	\$2,797
19-31404.103-R-2	09-27-306-161-1106	316	2,481	\$2,797
19-31404.104-R-2	09-27-306-161-1107	316	2,481	\$2,797
19-31404.105-R-2	09-27-306-161-1108	316	2,481	\$2,797
19-31404.106-R-2	09-27-306-161-1109	316	2,481	\$2,797
19-31404.107-R-2	09-27-306-161-1110	316	2,481	\$2,797
19-31404.108-R-2	09-27-306-161-1111	316	2,481	\$2,797
19-31404.109-R-2	09-27-306-161-1112	2,730	21,406	\$24,136
19-31404.110-R-2	09-27-306-161-1113	2,730	21,406	\$24,136
19-31404.111-R-2	09-27-306-161-1114	2,730	21,406	\$24,136
19-31404.112-R-2	09-27-306-161-1115	2,730	21,406	\$24,136
19-31404.113-R-2	09-27-306-161-1116	2,730	21,406	\$24,136
19-31404.114-R-2	09-27-306-161-1117	2,730	21,406	\$24,136

19-31404.115-R-2	09-27-306-161-1118	2,730	21,406	\$24,136
19-31404.116-R-2	09-27-306-161-1119	2,730	21,406	\$24,136
19-31404.117-R-2	09-27-306-161-1120	2,730	21,406	\$24,136
19-31404.118-R-2	09-27-306-161-1121	2,730	21,406	\$24,136
19-31404.119-R-2	09-27-306-161-1122	2,730	21,406	\$24,136
19-31404.120-R-2	09-27-306-161-1123	2,730	21,406	\$24,136
19-31404.121-R-2	09-27-306-161-1124	316	2,481	\$2,797
19-31404.122-R-2	09-27-306-161-1125	316	2,481	\$2,797
19-31404.123-R-2	09-27-306-161-1126	316	2,481	\$2,797
19-31404.124-R-2	09-27-306-161-1127	316	2,481	\$2,797
19-31404.125-R-2	09-27-306-161-1128	316	2,481	\$2,797
19-31404.126-R-2	09-27-306-161-1129	316	2,481	\$2,797
19-31404.127-R-2	09-27-306-161-1130	316	2,481	\$2,797
19-31404.128-R-2	09-27-306-161-1131	316	2,481	\$2,797
19-31404.129-R-2	09-27-306-161-1132	316	2,481	\$2,797
19-31404.130-R-2	09-27-306-161-1133	316	2,481	\$2,797
19-31404.131-R-2	09-27-306-161-1134	316	2,481	\$2,797
19-31404.132-R-2	09-27-306-161-1135	316	2,481	\$2,797
19-31404.133-R-2	09-27-306-161-1136	316	2,481	\$2,797
19-31404.134-R-2	09-27-306-161-1137	316	2,481	\$2,797
19-31404.135-R-2	09-27-306-161-1138	316	2,481	\$2,797
19-31404.136-R-2	09-27-306-161-1139	316	2,481	\$2,797
19-31404.137-R-2	09-27-306-161-1140	316	2,481	\$2,797
19-31404.138-R-2	09-27-306-161-1143	4,260	33,400	\$37,660

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 2019 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 is a 143-unit residential condominium building comprised of 85 residential condominium units, 55 deeded parking spaces, 2 common area PINs, and 1 exempt PIN. The building was constructed in 1975 and is located on a 391,865 square foot site. The property is located in Park Ridge, Maine 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 on comparable sales utilizing a condominium analysis consisting of 15 sales of condominiums from the subject property between 2016 and 2018. The appellant submitted 15 MLS sheets showing the sales of the individual sales. Additionally, the appellant

submitted documentation from the Illinois Department of Revenue that showed that Class 2 properties in Cook County experienced a three-year adjusted median level of assessment of 9.46%. Based on this, the appellant requested a reduction of total assessment to \$2,870,624.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$2,994,738. The subject's assessment reflects a market value of \$29,947,380 when applying the 10% level of assessment for class 2 property 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 comparable sales utilizing a condominium analysis consisting of 37 sales of condominiums from the subject property between 2016 and 2019.

Maine Township High School District No. 207 was granted intervention on this docket via a letter dated September 10, 2020. In a letter dated March 8, 2021, this intervenor adopted and affirmed the valuation evidence submitted by the Cook County Board of Review.

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 the appellant's comparable sales condominium analysis. The condominium analysis between the appellant and the board of review were largely the same, but there were some notable differences, beyond the different timeframes. The board of review included in their analysis sales from 2016 through 2018 there were not included by the appellant. Likewise, the appellant included a sale in their analysis that was not included by the board of review. Notably, the appellant submitted supplement evidence beyond the grid of their condominium analysis. The appellant submitted an MLS sheet documenting the sales of each of the PINs listed in their condominium analysis. The Board finds that the best evidence of market value in this record is the evidence submitted by the appellant and that the appellant proved the market value by a preponderance of the evidence. Additionally, the Board finds that the appellant provided sufficient evidence to prove that the three-year adjusted mean level of assessment was 9.46% as determined by the Illinois Department of Revenue. Based on this evidence the Board finds a reduction in the subject's assessment 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:

<u>CERTIFICATION</u>

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:

May 21, 2024

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 <u>PETITION AND EVIDENCE</u> 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

Boardwalk of Park Ridge Condominium Association, by attorney: Joanne Elliott Elliott & Associates Attorneys, PLLC 1430 Lee Street Des Plaines, IL 60018

COUNTY

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

INTERVENOR

Maine Twp. H.S.D. #207, by attorney: Ares G. Dalianis Franczek P.C. 300 South Wacker Drive Suite 3400 Chicago, IL 60606