



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

APPELLANT: Pines Condo Assoc
DOCKET NO.: 19-34615.001-R-1 through 19-34615.045-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Pines Condo Assoc, the appellant(s), by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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
19-34615.001-R-1	09-16-303-027-1001	515	14,542	\$15,057
19-34615.002-R-1	09-16-303-027-1002	527	14,870	\$15,397
19-34615.003-R-1	09-16-303-027-1003	520	14,669	\$15,189
19-34615.004-R-1	09-16-303-027-1004	496	13,985	\$14,481
19-34615.005-R-1	09-16-303-027-1005	520	14,669	\$15,189
19-34615.006-R-1	09-16-303-027-1006	509	14,361	\$14,870
19-34615.007-R-1	09-16-303-027-1007	527	14,870	\$15,397
19-34615.008-R-1	09-16-303-027-1008	496	13,985	\$14,481
19-34615.009-R-1	09-16-303-027-1009	539	15,198	\$15,737
19-34615.010-R-1	09-16-303-027-1010	521	14,702	\$15,223
19-34615.011-R-1	09-16-303-027-1011	526	14,836	\$15,362
19-34615.012-R-1	09-16-303-027-1012	533	15,037	\$15,570
19-34615.013-R-1	09-16-303-027-1013	501	14,146	\$14,647
19-34615.014-R-1	09-16-303-027-1014	526	14,836	\$15,362
19-34615.015-R-1	09-16-303-027-1015	515	14,542	\$15,057
19-34615.016-R-1	09-16-303-027-1016	533	15,037	\$15,570
19-34615.017-R-1	09-16-303-027-1017	501	14,146	\$14,647
19-34615.018-R-1	09-16-303-027-1018	545	15,366	\$15,911
19-34615.019-R-1	09-16-303-027-1019	527	14,870	\$15,397
19-34615.020-R-1	09-16-303-027-1020	539	15,198	\$15,737
19-34615.021-R-1	09-16-303-027-1021	532	14,997	\$15,529
19-34615.022-R-1	09-16-303-027-1022	507	14,314	\$14,821
19-34615.023-R-1	09-16-303-027-1023	532	14,997	\$15,529
19-34615.024-R-1	09-16-303-027-1024	521	14,702	\$15,223
19-34615.025-R-1	09-16-303-027-1025	539	15,198	\$15,737
19-34615.026-R-1	09-16-303-027-1026	507	14,314	\$14,821
19-34615.027-R-1	09-16-303-027-1027	550	15,527	\$16,077

19-34615.028-R-1	09-16-303-027-1028	533	15,037	\$15,570
19-34615.029-R-1	09-16-303-027-1029	545	15,366	\$15,911
19-34615.030-R-1	09-16-303-027-1030	529	14,924	\$15,453
19-34615.031-R-1	09-16-303-027-1031	513	14,475	\$14,988
19-34615.032-R-1	09-16-303-027-1032	529	14,924	\$15,453
19-34615.034-R-1	09-16-303-027-1034	545	15,366	\$15,911
19-34615.035-R-1	09-16-303-027-1035	513	14,475	\$14,988
19-34615.036-R-1	09-16-303-027-1036	556	15,694	\$16,250
19-34615.037-R-1	09-16-303-027-1037	539	15,198	\$15,737
19-34615.038-R-1	09-16-303-027-1038	550	15,527	\$16,077
19-34615.039-R-1	09-16-303-027-1039	543	15,326	\$15,869
19-34615.040-R-1	09-16-303-027-1040	519	14,635	\$15,154
19-34615.041-R-1	09-16-303-027-1041	543	15,326	\$15,869
19-34615.042-R-1	09-16-303-027-1042	533	15,570	\$16,103
19-34615.043-R-1	09-16-303-027-1043	550	15,527	\$16,077
19-34615.044-R-1	09-16-303-027-1044	519	14,635	\$15,154
19-34615.045-R-1	09-16-303-027-1045	562	15,862	\$16,424

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 consists of a 39-year-old condominium complex with forty-five individual residential condominium units located in the same complex. The property has a 36,577 square foot site located in Des Plaines, Maine Township, Cook County. The subjects are 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 from the subject building. Appellant asserts that for lien year 2019, an assessment of \$678,483 has been placed on the “participating units”. Appellant submitted property index sheets with information, including sales information, on twelve condominium units from the subject building. The sales occurred between 2016 and 2019 for prices ranging from \$133,000 and \$177,000. One of the condominiums was sold for \$120,500 as a foreclosure sale. Appellant asserts that “a fair assessment for the units located within the association is based on the hybrid purchase price theory that takes into account all the sales that recently occurred in the association or 26.81% of the total sales for those comparable units recently sold and current economic as well as market forces”. Appellant determined that the total sale price for the submitted comparable condominiums was \$1,835,800. Appellant then subtracted \$183,580 (10% of the total sales) for personal property to achieve an adjusted value of

\$1,652,220. Ultimately the appellant reached a total value of the Association of \$6,162,241. The appellant then multiplied that by the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance to get their “desired assessed value” of \$616,224. Based on this evidence, the appellant is requesting the assessment be reduced to \$616,224.

Appellant provided a copy of the final board of review 2019 assessment decision for the subjects (PIN 09-16-303-027-1001 thru -1045). The board of review finalized the assessed valuation for the subject property at \$678,483 in 2019.

In support of its contention of the correct assessment the board of review submitted a 2019 condominium analysis showing that 13 units in the subject’s complex that sold between June 2016 to August 2018 for an aggregate price of \$1,941,900. The sale price was then divided by the percentage of ownership in the common elements of the units sold (29.154%) to arrive at a suggested total market value of the complex of \$6,660,835. This analysis included eleven of the comparable units submitted by the appellant. Based on this analysis, the board of review requested confirmation of the subject’s current 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 proven 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 did not meet this burden of proof, and a reduction in the subject’s assessment is not warranted.

“Real property taxes . . . which are authorized by law to be assessed against and levied upon real property shall be assessed against and levied upon each unit and the owner’s corresponding percentage of ownership in the common elements as a tract, and not upon the property as a whole.” 765 ILCS 605/10(a).

As preliminary matter the Board notes that the major difference between the appellant’s condominium analysis and the board of review’s condominium analysis is the appellant’s request to include a 10% reduction of total sales price for personal property. The board gives little weight to the appellant’s request for a reduction of the sales price of 10% based on personal property. The appellant provided no evidence, statutory authority, or case law to justify, support, or explain their methodology or their calculations for the reduction request of 10% for “personal property.” Additionally, appellant failed to establish by a preponderance of the evidence that personal property was involved in the sales of the comparable properties. Appellant submitted MLS listings for the suggested comparable sales indicating that items such as ovens, dishwashers, microwaves, refrigerators, disposals, and washer/dryers were included in the sales of those comparable properties. But there is no evidence of how or whether those items are attached to the realty. In Illinois, real property includes, “the land itself, with all things contained thereon, and also all buildings, structures, and improvements, and other permanent fixtures thereon[.]” 35 ILCS 200/1-130. A fixture is considered real property because it is incorporated

into or attached to the realty. *A&A Market, Inc. v. Pekin Ins. Co.*, 306 Ill. App. 3d 485, 488 (1st Dist. 1999). The factors for determining whether property is personal or real are: 1) the nature of the attachment to the realty, 2) its adaptation to and necessity for the purpose or use to which the premises is devoted, and 3) whether it was intended that the item become part of the realty. *Id.* The MLS listings provided by the appellant as evidence do not address the factors set forth above for determining whether property is real or personal. Furthermore, the appellant submitted no evidence about the value of these items to justify the downward adjustment that was sought. The Board finds the appellant utilized a 10% personal property deduction in their analyses, however, without evidence in the record to support the use of this personal property deduction, the Board finds this argument is without merit.

The Board finds the appellants evidence (without a deduction for personal property) showed a total sale price for the submitted comparable condominiums of \$1,835,800 for a total market value of \$6,847,444 when applying the total percentage of ownership of 26.81%. This resulted in an assessed value of \$684,744 when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

Appellant provided a copy of the final board of review 2019 assessment decision for this subject (PIN 09-16-303-027-1001 thru -1045). The board of review finalized the assessed valuation for the subject property at \$678,483 in 2019. The final assessed value as determined by the Board of Review for the lean year of this appeal is less than the assessed value, not factoring in the personal property deduction, of \$684,744 as submitted by the appellant.

Additionally, the appellant asserted that the proposed assessment for the subject units was derived from a “hybrid purchase price theory,” purportedly incorporating recent sales within the association—representing 26.81% of total comparable unit sales—and current economic and market conditions. However, the appellant failed to define this methodology, explain its relevance, or demonstrate how it was applied in the valuation analysis.

In the present case, both the appellant and the Board of Review submitted comparable sales data, all pertaining to units within the subject property. Notably, eleven of the appellant’s comparable properties were also utilized by the Board of Review in its condominium sales analysis, indicating substantial overlap in the data considered.

The Board notes that the appellant applied a 10% personal property deduction in its valuation analysis. However, the record contains no supporting documentation or justification for this adjustment. As such, the Board finds the application of the personal property deduction to be without merit.

Upon review of the evidence presented, the Board finds that the most credible indicator of market value is a sales analysis incorporating all recent arm’s-length transactions within the subject building submitted by both parties. This analysis disregards ownership percentage and excludes adjustments for personal property, which were unsupported by evidence in the record.

Additionally, the Board notes that one of the appellant's submitted comparable properties was identified as a foreclosure sale. As foreclosure transactions are not considered representative of fair market value, this sale was excluded from the Board's analysis.

Based on the credible sales data from both parties, the Board finds that the most probative evidence of market value consists of arm's-length sales of units within the same complex as the subject property, occurring between 2016 and 2019. The subject property's current assessment of \$678,483 falls within the range of market values established by these comparable properties.

Accordingly, the Board concludes that the appellant has not met the burden of proving, by clear and convincing evidence, that the subject property is inequitably assessed. Therefore, a reduction in the subject property's assessment is not 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: _____

January 20, 2026



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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