



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

APPELLANT: Chien Cheng K. Lai
DOCKET NO.: 19-42584.001-R-1
PARCEL NO.: 14-31-328-128-1006

The parties of record before the Property Tax Appeal Board are Chien Cheng K. Lai, 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:

LAND: \$3,043
IMPR.: \$57,109
TOTAL: \$60,152

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

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 11-year-old condominium unit located in an 11-unit condominium building on a 9,117 square foot site, in West Chicago Township, Cook County. The subject has a 9.82% ownership interest in the common elements. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant contends overvaluation as the basis of the appeal. In support of this argument, appellant submitted sales information for five condominium units in the same building as the subject property. The comparable properties sold between July 2014 and October 2018 for prices ranging between \$550,000 and \$615,000. Appellant calculated the total sales at \$2,879,500 and deducted 10% for personal property for an adjusted total of \$2,591,550. After calculating the comparable sales properties' percent ownership of common elements of 46.96%,

the total value of the building was \$5,518,633, multiplied by the subject's 9.82% ownership, resulted in a total market value for the subject property of \$541,930. Based on this evidence, appellant requested the subject property's total assessment be reduced to \$54,193

The board of review submitted its "Board of Review Notes on Appeal" depicting a total assessed valuation of \$60,152, with an improvement assessment of \$57,109. The subject's assessment reflects a market value of \$601,520 when applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment, the board of review submitted a "Condominium Analysis Results for 2020" report depicting a condominium analysis of two condominium sales in the same building as the subject property. The comparable sales sold in 2018 for prices ranging between \$588,500 and \$615,000 for a total value of \$1,203,500. An adjustment factor of 1% was applied to this total price to arrive at an adjusted total value of \$1,191,466. Based on the comparable sales units' combined 19.06% ownership in the common elements, the resulting total market value for the building was \$6,251,133 and an assessed value of \$625,113 after applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance. These sales were also included in the appellant's evidence.

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 appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

Regarding the personal property, neither party submitted evidence that personal property was included in the sale. In addition, the board of review did not provide sufficient evidence to support the inclusion in its calculations of an "adjustment factor (1%)." The Board finds the best evidence of market value to be the two most recent sales comparables sold in 2018 submitted by both appellant and the board of review. These sales had a combined total value of \$1,203,500. Applying these units' percentage ownership of 19.06% arrives at a value for the whole building of \$6,314,270. Based on the total value of the building, the subject property's ownership in the common elements of 9.82% results in a total assessed value for the subject property of \$62,006, after applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance. Based on this record, the Board finds that the subject property's current assessment of \$60,152 is below the amount reflected by the best indicator of market value in this record and supports the current assessment. Accordingly, appellant did not prove by a preponderance of the evidence that the subject property was overvalued and a reduction in the subject's assessment to appellant's request 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: March 21, 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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