



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

APPELLANT: Ben Aldridge  
DOCKET NO.: 19-48122.001-R-1  
PARCEL NO.: 02-01-400-017-1046

The parties of record before the Property Tax Appeal Board are Ben Aldridge, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; 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:** \$3,085  
**IMPR.:** \$17,006  
**TOTAL:** \$20,091

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 one unit in a 308-unit, residential condominium complex situated on a 1,315,365 square foot parcel of land. The building is 36-years old. The subject unit has a .4265% ownership interest in the common elements. The property is located in Palatine, Palatine 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 for 11 sales comparables in the same condominium complex that had the same percentage of ownership interest and sold between November 2016 and November 2020. They ranged in sale price from \$122,500 to \$200,000. Based on this evidence, the appellant is requesting an assessment amount of \$15,452.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$20,091. The subject's assessment reflects a market value of \$200,910 when applying 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 a condominium analysis showing that 57 units in the subject's building sold between April 2016 and February 2020 for an aggregate amount of \$8,849,702. The sale price was then divided by the percentage of ownership interest in the common elements of the units sold (18.5607%) to arrive at a suggested total market value for the building of \$47,679,785, multiplied by the percentage of ownership of the subject unit to arrive at a fair market value of \$203,354. Based on this analysis, the board of review requested confirmation of the subject's current assessment.

In rebuttal, appellant argued the board of review relied on sales of units different from the subject which skewed the market value results. They further argued this technique was inconsistent with the board's own policy and practice and therefore, its sales analysis should be given no weight.

The matter was set for a hearing before an ALJ on February 22, 2024. On February 22, 2024, however, the parties entered into a written agreement to waive the hearing and have the matter decided on the evidence that had been submitted.

### **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).

In the instant case, the Board was provided with sales from both parties, all of which were for units located in the subject building. The Board finds the appellant utilized a 15% personal property deduction in their analyses, however, there was no evidence in the record to support the use of this personal property deduction. Therefore, the Board finds this argument is without merit. However, the Board finds a sales analysis, which accounts for all recent sales, regardless of percentage of ownership interest, and absent a personal property deduction is the best evidence using the sales presented by the parties. The board of review referred to multiple sales

as “custom sales” without referencing its meaning or significance. Despite the lack of explanation those same sales were utilized by the appellant in their analysis, consequently this Board will continue to give them weight. Regardless, the market value for the subject indicated by these sales is greater than its assessed valuation (even after removing from consideration 2016 sales for being too distant from the relevant valuation date) which further supports a conclusion that the board of review did not overvalue the subject.

The appellant selectively submitted information about 11 suggested sales comparables, relying only on those with the same percentage of ownership interest. It should be noted, all the comparables employed by the appellant were comparables utilized by the board of review in its condominium analysis. Appellant attempted to distinguish the highest selling unit at \$200,000 as an outlier for its superior location and characteristics. The appellant failed to provide enough information to determine whether waterfront view units sell for higher prices than non-waterfront view units and how many of the units relied on by either party consisted of these types of units. Additionally, this Board will not completely disregard the sales of other units based on their differing percentage ownership interest in the common elements as this argument is unsupported.

The Board finds that the subject unit had a market value of \$203,354 for the 2019 assessment year. The subject’s current assessment of \$20,091, reflects a market value below the market value established by the best evidence in this record. Based on this record, the Board finds the appellant has not proven, by a preponderance of the evidence, that the subject is overvalued, and that a reduction in the subject’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:

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 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Ben Aldridge, by attorney:  
Stephanie Park  
Park & Longstreet, P.C.  
1620 W Colonial Pkwy.  
Inverness, IL 60067

COUNTY

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