



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

APPELLANT: Mike Joudeh
DOCKET NO.: 20-20765.001-R-1
PARCEL NO.: 24-32-201-036-1002

The parties of record before the Property Tax Appeal Board are Mike Joudeh, the appellant, by attorney Ellen G. Berkshire, of Verros Berkshire, PC in Oakbrook Terrace, 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: \$1,497
IMPR.: \$4,660
TOTAL: \$6,157

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 2020 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 single residential condominium unit located within a twelve-unit condominium building that is approximately 37 years old. The unit has a 7.4851% ownership interest in the condominium.¹ The condominium property has a 25,000 square foot site and is located in Crestwood, Worth Township, Cook County. The subject unit 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 the recent sale of the subject by completing Sec. IV – Recent Sale Data of the appeal petition and provided supporting documentation. The appellant reported

¹ As reported by the board of review and not challenged by the appellant, the subject unit has a 7.4851% ownership interest in the condominium property.

the property was purchased on June 22, 2018 for a price of \$27,000 from Community Initiatives, Inc., reportedly a “community development organization that purchased the property at an REO sale.” The appellant further reported that the property was not advertised, the sale was due to foreclosure, but was not sold via contract for deed and the parties to the transaction were not related. A copy of the Settlement Statement reiterated the date of sale and sale price with no commissions paid. A copy of the Quit Claim Deed was also supplied as the recorded transfer document. Based on the foregoing evidence, the appellant requested a reduction in the assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing an assessment for the subject of \$6,157. The subject unit's assessment reflects a market value of \$61,570, when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 of 10%.

In support of its contention of the correct assessment, the board of review submitted a document entitled Condominium Analysis Results for 2020 in which it used two sales within the subject's condominium property that occurred in August 2018 and December 2019 for prices of \$60,000 and \$90,000, respectively. The board of review reported the units that sold have 7.6446% and 8.5992% ownership interest in the condominium property, respectively. Dividing the total consideration of \$150,000 by the total percentage of ownership in the condominium of the units that sold of 16.2438% resulted in a full value for the condominium property of \$923,429. Multiplying the full value of the condominium by the percentage of ownership in the unit under appeal of 7.4851% results in a market value of \$69,120, rounded. Then applying the 10% Ordinance level of assessment for class 2-99 property results in an assessment for the unit under appeal of \$6,912, although the board of review analysis set forth a total assessment for the entire condominium property of \$92,343.

Based on the foregoing evidence and analysis, the board of review requested confirmation of the subject unit's assessment of \$6,157, which is below the analysis using sales within the condominium property.

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

The appellant submitted evidence of the unadvertised sale of the subject property in June 2018 for \$27,000 and the board of review presented two sales within the condominium property to support their respective positions before the Property Tax Appeal Board. After analyzing the data provided, the Board has given reduced weight to the sale of the subject property that occurred in June 2018, as the sale of the subject did not have the elements of an arm's length transaction as it was not advertised or exposed on the open market.

The Board finds the best evidence of market value in the record to be the two comparable sales submitted by the board of review. These comparables sold in August 2018 and December 2019 for prices of \$60,000 and \$90,000, respectively. These properties also sold more proximate in time to the assessment date at issue than the sale of the subject in June 2018. These sales reflect a total consideration of \$150,000 and using the combined percentage interest of ownership in the units that sold of 16.2438%, the calculation indicates a full value for the condominium property of \$923,429. Next, the Board finds that applying the subject unit's percentage ownership interest in the condominium property of 7.4851% to the entire building value results in a market value of calculation of \$69,120, which is greater than the subject's estimated market value as reflected by its assessment of \$61,570. Based on this evidence, the Board finds no change 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

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 16, 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

Mike Joudeh, by attorney:
Ellen G. Berkshire
Verros Berkshire, PC
15660 Midwest Road
Suite 300
Oakbrook Terrace, IL 60181

COUNTY

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