



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

APPELLANT: Mark Segal
DOCKET NO.: 20-23909.001-R-1
PARCEL NO.: 17-08-220-043-1002

The parties of record before the Property Tax Appeal Board are Mark Segal, the appellant(s), by attorney Mary Kate Gorman, Attorney at Law in Chicago, 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: \$4,862
IMPR.: \$86,322
TOTAL: \$91,184

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 condominium unit in a three-unit building. The property is located in Chicago, West Chicago Township, Cook County. It has 2,290 square feet of living area. Features include central air conditioning, a parking space, two full bathrooms, and two fireplaces. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts that the market value of the subject property is not accurately reflected in its assessed valuation. In support of this contention, the appellant submitted information about ten suggested comparable sales of condominium units in other buildings.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$91,184. The subject property has an improvement assessment of

\$86,322. In support of its contention of the correct assessment, the board of review submitted information about the sales of two other condominium units in the same building as appellant's unit, and a document titled Condominium Analysis Results for 2020 that analyzes those sales.

Conclusion of Law

The appellant asserts overvaluation as the basis of this appeal. When market value is the basis of the appeal, the taxpayer must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 on this basis is not warranted.

Appellant submitted information about ten suggested equity comparables. These suggested comparables are condominium units in buildings that are located within a quarter mile of the subject property. The information provided included proximity to the subject, lot size, age of the improvements, living area square footage, number of bathrooms, number of fireplaces, date of sale, sale price, land assessment, improvement assessment, and total assessment. This information indicates that significant dissimilarities exist between most of these comparables and the subject. The subject has considerably more living area than nine of appellant's comparables, and the building housing the subject is considerably older than the buildings housing those nine comparables. Furthermore, there is no evidence about the amenities available at any of the buildings housing the comparables, except that each comparable includes one or two parking spaces. Nor is their evidence regarding the percentage of ownership of the common elements attributable to each comparable unit. Accordingly, the Board gives little weight to the appellants' comparables because it cannot be determined that their sales prices reflect the subject's market value.

The Board gives some weight to the board of review's Condominium Analysis Results for 2020, which analyzes recent sales of the two other units in the subject's building. The analysis indicates that the appellant's unit comprises a 40% ownership interest in the subject building's common elements. A unit that comprises a 41.3% interest in the subject building's common elements sold for \$1,050,000 on March 1, 2018. A unit comprising an 18.7% interest in the subject building's common elements sold for \$460,000 on July 25, 2019. The total consideration from these two sales representing a 60% ownership interest was \$1,510,000, indicating the full value of all units was \$2,516,666, and the appropriate assessed value of all units was \$251,667. Under this rationale, the proper assessed value of the appellant's condominium unit would be 40% of that total, or \$100,667, which is higher than the actual assessed value of \$91,184.

Under these circumstances, the appellant has not shown by a preponderance of the evidence that the subject was overvalued. The Board therefore finds that a reduction in the subject's assessment on this basis 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: February 20, 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

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