



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

APPELLANT: 320 Beach Avenue Condominium Association
DOCKET NO.: 20-42268.001-R-1 through 20-42268.012-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are 320 Beach Avenue Condominium Association, the appellant, by attorney Timothy C. Jacobs, of Kovitz Shifrin Nesbit in Mundelein; 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
20-42268.001-R-1	15-33-418-016-1001	506	9,693	\$10,199
20-42268.002-R-1	15-33-418-016-1002	506	9,693	\$10,199
20-42268.003-R-1	15-33-418-016-1003	506	9,693	\$10,199
20-42268.004-R-1	15-33-418-016-1004	506	9,693	\$10,199
20-42268.005-R-1	15-33-418-016-1005	512	9,810	\$10,322
20-42268.006-R-1	15-33-418-016-1006	512	9,810	\$10,322
20-42268.007-R-1	15-33-418-016-1007	512	9,810	\$10,322
20-42268.008-R-1	15-33-418-016-1008	512	9,810	\$10,322
20-42268.009-R-1	15-33-418-016-1009	506	9,693	\$10,199
20-42268.010-R-1	15-33-418-016-1010	506	9,693	\$10,199
20-42268.011-R-1	15-33-418-016-1011	506	9,693	\$10,199
20-42268.012-R-1	15-33-418-016-1012	506	9,693	\$10,199

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 is improved with a 3-story 12-unit condominium building that is approximately 52 years old. The property has an approximately 12,210 square foot site and is

located in La Grange Park, Proviso 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 and assessment inequity as the bases of the appeal. In support of the overvaluation argument, the appellant submitted information on three comparable sales of residential condominium units located in the subject's condominium building. The three units sold from June 2017 to September 2020 for a total consideration of \$307,200 and have a combined ownership interest of 25% in the condominium. The appellant divided the total consideration by the ownership interest to arrive at an estimated full value for the condominium of \$1,228,800. To calculate the subject's total assessment, the appellant multiplied the estimated market value of \$1,228,800 by 8.80%, which the appellant described as the "de facto level of assessment for Cook County residential property reflected in the 2019 Illinois Department of Revenue's Sales Ratio Study," to arrive at a total assessed value for the subject of \$108,134 (rounded).

To document the comparable sales, the appellant submitted a spreadsheet summarizing the sales and depicting the corresponding percentage of ownership and the purchase dates. The spreadsheet disclosed the three comparables sales to be arm's length transactions. The appellant also submitted copies of the Multiple Listing Service (MLS) data sheets for each comparable.

As to the lack of equity argument, the appellant requests an 8.80% "de facto" level of assessment, as determined by the 2019 Illinois Department of Revenue's Sales Ratio Study, be applied. Based on the foregoing evidence and argument, the appellant requested a reduction in the total assessment of the subject 12-unit condominium to \$108,134.

The board of review submitted its "Board of Review Notes on Appeal" for one of the 12 units. The appellant submitted a copy of the Cook County Board of Review's final decision disclosing the total assessment for the subject of \$122,880.¹ The subject's assessment reflects a market value of \$1,228,800 when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance (herein after known as the Ordinance) as determined by the Illinois Department of Revenue.

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 the same three sales presented by the appellant to estimate the full market value of the subject. The board of review arrived at a total consideration for the three condominium units of \$307,200 and the analysis indicated these three units had a 25% ownership interest in the condominium. Dividing the total consideration by the percentage of ownership in the condominium resulted in a full value of the condominium of \$1,228,800. Applying the 10% Ordinance level of assessment for class 2 property results in a total assessment for the subject of \$122,880. Based on this evidence, the board of review requested the subject's assessment be confirmed.

¹ The improvement assessment for PINs 15-33-418-016-1005 through 1008 should be \$9,810 in order to correspond with the total assessment reported in the board of review's final decision.

Conclusion of Law

The appellant contends, in part, 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 and board of review provided an identical condominium analysis utilizing the same three comparable sales to support their respective positions, both estimating the subject property had a market value of \$1,228,800 which is equivalent to the market value reflected by the total assessment and using the Ordinance level of assessment for class 2-99 property. Therefore, the Board finds no reduction based on market value is warranted.

The appellant also argued the subject is inequitably assessed, asserting the subject's total assessed value should be \$108,134 given the purported 8.8% "de facto" level of assessment for 2019 as determined by the Illinois Department of Revenue. The Board finds the argument lacks merit on this record. The appellant applied an 8.8% "de facto" level of assessment based on the 2019 Illinois Department of Revenue Sales Ratio Study to the subject's estimated market value. However, the appellant failed to provide any documentation to support the application of this level of assessment or any legal reason why the purported 2019 level of assessment should be applied to an appeal for the 2020 tax year. Furthermore, the appellant provided no evidence or documentation to support its argument with respect to the level of assessment for class 2 property under the Ordinance as required by section 1910.50(c)(2)(A) & (B) of the rules of the Property Tax Appeal Board. (86 Ill. Admin. Code §1910.50(c)(2)(A) & (B)) Based on this evidence, the Board finds 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

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

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