



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

APPELLANT: Imagine Print Group  
DOCKET NO.: 06-22965.001-I-1 through 06-22965.003-I-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Imagine Print Group, the appellant; by attorneys Dan Pikarski and Kris Murphy with the law firm of Gordon & Pikarski in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds a reduction 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
06-22965.001-I-1	10-29-301-028-0000	56,692	213,315	\$270,007
06-22965.002-I-1	10-29-301-005-0000	65,546	63,480	\$129,026
06-22965.003-I-1	10-29-301-015-0000	120,547	326,420	\$446,967

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property consists of a 158,684 square foot, irregularly shaped, land parcel improved with a one-story, masonry-constructed, industrial building. The improvement contains 81,000 square feet of building area including 15,000 square feet of finished office area built in 1963 with an addition in 2000.

The appellant, via counsel, argued that the market value of the subject property is not accurately reflected in the property's assessed valuation as the basis of this appeal.

In support of the market value argument, the appellant submitted a complete summary appraisal of the subject property with an effective date of January 1, 2006 undertaken by Joseph Ryan, a real estate appraiser holding the designation of Member of the Appraisal Institute (hereinafter MAI) as well as Michael Makofski, a State Certified General Real Estate Appraiser. The appraisal indicated that the intended use of this appraisal was to estimate the market value of the real estate. In addition,

the appraisal stated that the appraisers personally inspected the subject site and its surrounding area; collected and analyzed comparable data; applied appropriate valuation methodologies and developed a final value conclusion for the subject.

Upon review of the sales history of the subject, the appraisers reported that the subject had not been sold in the five years prior to this appraisal. Further, the appraisal described the subject's regional and immediate neighborhood. As to the subject's site, the appraisal indicated that the subject has an irregular-shaped, interior site in Niles with a land-to-building ratio of 1.96:1.

As to the subject's building, the appraisers stated that the one-story, masonry building contains 81,000 square feet of building area including 15,000 square feet of finished office area or 18.5% as well as 1,200 square feet of a detached garage building. In addition, the appraisers noted that the subject contains six truck docks as well as ceiling heights that range from 14 to 20 feet. The appraisers noted that the structure were in average condition given their age and utility.

The appraisers estimated an overall effective age of 30 years for the subject's buildings. The appraisal stated that the subject's highest and best use, as if vacant, was for commercial or industrial development, while the highest and best use, as if improved, was to maintain the existing improvements in its continued current use.

The appraisers developed the three traditional approaches to value. The cost approach estimated a value of \$2,500,000, the income approach estimated a value of \$2,340,000, and the sales comparison approach estimated a value of \$2,350,000. In reconciling these approaches to value, the appraisers placed maximum emphasis on the sales comparison approach to reflect a final value of \$2,350,000 for the subject.

The first method developed was the cost approach. The initial step under the cost approach was to estimate the value of the site and in doing so the appraisers undertook an analysis of four suggested land sales of local sites. These properties sold from October, 2001, to October, 2003, for prices that ranged from \$2.55 to \$6.15 per square foot. They ranged in size from 97,966 to 524,145 square feet of land. Upon consideration of the data, the appraisers opined that the market value of the land would be \$6.00 per square foot or \$950,000, rounded.

Using the Marshall Valuation Service, the appraisers classified the subject as a Class C average quality, light manufacturing building with an adjusted base cost at \$52.40 per square foot. Thereafter, the total amount of depreciation present at the subject was estimated by utilizing the age-life method, which reflected depreciation at 66.67% without functional or external obsolescence. Total accrued depreciation resulted in a depreciated value of the improvements at \$1,457,098. Adding the

land value of \$950,000 and additional on-site improvements of \$100,000 reflected a final estimate of value under the cost approach of \$2,500,000, rounded.

The next developed approach was the income approach. The appraisers obtained and analyzed lease data on four properties. The properties ranged in size from 57,000 to 84,954 square feet of rentable area and from \$2.95 to \$3.71 per square foot net rent. Therefore, potential gross income for the subject was estimated at \$3.50 per square foot, or \$283,500. Less a deduction for vacancy and collection losses at 8%, or \$22,680 reflected an effective gross income of \$260,820. Total expenses of \$26,730 were deducted reflecting a net operating income of \$234,090. Capitalizing the subject's net income by 10% produced a value estimate under the income approach of \$2,340,000, rounded.

Under the sales comparison approach to value, the appraisers utilized five sale comparables, which were one-story, masonry or masonry and metal paneled, industrial buildings. These comparables sold from March, 2002, through June, 2005, for prices that ranged from \$1,350,000 to \$3,180,000, or from \$19.41 to \$34.58 per square foot. The properties range: in age from 24 to 47 years; in number of truck docks from 3 to 16; in office area from 4% to 38%; in ceiling heights from 9 feet to 22 feet; and in size from 67,500 to 131,000 square feet of building area. After making adjustments to these properties, the appraisers estimate a market value for the subject under this approach of \$29.00 per square foot of building area or \$2,350,000, rounded. In reconciling the three approaches to value, the appraiser placed primary significance on the sales approach to value with secondary emphasis on the income approach to value to reflect a final market value estimate of \$2,350,000, for the subject.

At hearing, the appellant's attorney rested upon the written evidence submissions in the record. Based upon this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted "Board of Review-Notes on Appeal" wherein the subject's total assessment was \$932,723 for tax year 2006 according to the assessor. The subject's assessment reflects a market value of \$2,565,897 or \$31.68 per square foot for tax year 2006 using the Cook County Ordinance level of assessment for Class 5b, industrial property of 36%. Nevertheless, the board of review's notes reflect that subject's total assessment was actually \$874,801 reflecting a market value of \$2,430,003 for tax year 2006.

In addition, the board of review submitted a memorandum as well as CoStar Comps printouts for eight suggested comparables with only two of these properties located in Niles as is the subject. The properties contained one-story, masonry buildings, with properties #2 and #6 containing multiple tenants. The data reflected that the properties were accorded varying usages, such as: Class B manufacturing, Class C warehouse, Class A

manufacturing, storage center, and/or industrial building. They sold from May, 2001, to March, 2007, for prices that were in an unadjusted range from \$26.29 to \$51.79 per square foot. The buildings ranged in age from 20 to 49 years and in size from 73,742 to 85,850 square feet of building area. As a result of its analysis, the board requested confirmation of the subject's assessment.

At hearing, the board of review's representative stated that the board of review would rest upon the written evidence submissions.

After considering the arguments and reviewing the evidence, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal.

When overvaluation is claimed the appellant has the burden of proving the value of the property by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3<sup>rd</sup> Dist. 2002); Winnebago County Board of Review v. Property Tax Appeal Board, 313 Ill.App.3d 179 (2<sup>nd</sup> Dist. 2000). Proof of market value may consist of an appraisal, a recent arm's length sale of the subject property, recent sales of comparable properties, or recent construction costs of the subject property. 86 Ill.Admin.Code 1910.65(c). Having considered the evidence presented, the Board concludes that the evidence indicates a reduction is warranted.

In determining the fair market value of the subject property, the Board finds the best evidence to be the appellant's appraisal. The appellant's appraisers utilized the three traditional approaches to value, while placing maximum emphasis on the sales comparison approach to value in determining the subject's market value. The Board further finds this appraisal to be persuasive for the appraisers personally inspected the subject property and utilized market data not only in the cost and income approaches to value, but also in the sales comparison approach, while providing sufficient detail regarding each sale as well as adjustments where necessary.

Moreover, the Board accorded diminished weight to the board of review's limited and raw sales data.

Therefore, the Board finds that the subject property contained a market value of \$2,350,000 for tax year 2006. Since the market value of the subject has been established, the Cook County Ordinance level of assessment for Class 5b, industrial property of 36% will apply. In applying this level of assessment to the subject, the total assessed value is \$846,000, while the subject's current total assessed value is above this amount at \$874,801. Therefore, the Board finds that a reduction is 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.

*Ronald R. Guit*

Chairman

*K. L. Fern*

Member

*Frank J. Grief*

Member

*Mario M. Louie*

Member

*Shawn R. Lerski*

Member

DISSENTING:

C E R T I F I C A T I O N

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: October 22, 2010

*Allen Castrovillari*

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 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 the subsequent year 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.

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.