



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

APPELLANT: Randall Anderson  
DOCKET NO.: 08-24633.001-R-1 through 08-24633.018-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Randall Anderson, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented, 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
08-24633.001-R-1	13-35-122-044-1001	490	13,882	\$14,372
08-24633.002-R-1	13-35-122-044-1002	529	14,989	\$15,518
08-24633.003-R-1	13-35-122-044-1003	529	14,989	\$15,518
08-24633.004-R-1	13-35-122-044-1004	529	14,989	\$15,518
08-24633.005-R-1	13-35-122-044-1005	446	12,621	\$13,067
08-24633.006-R-1	13-35-122-044-1006	446	12,621	\$13,067
08-24633.007-R-1	13-35-122-044-1007	446	12,621	\$13,067
08-24633.008-R-1	13-35-122-044-1000	226	6,418	\$ 6,644
08-24633.009-R-1	13-35-122-044-1009	364	10,306	\$10,670
08-24633.010-R-1	13-35-122-044-1010	364	10,306	\$10,670
08-24633.011-R-1	13-35-122-044-1011	364	10,306	\$10,670
08-24633.012-R-1	13-35-122-044-1012	315	8,929	\$ 9,244
08-24633.013-R-1	13-35-122-044-1013	375	10,608	\$10,983
08-24633.014-R-1	13-35-122-044-1014	375	10,608	\$10,983
08-24633.015-R-1	13-35-122-044-1015	375	10,608	\$10,983
08-24633.016-R-1	13-35-122-044-1016	391	11,078	\$11,469
08-24633.017-R-1	13-35-122-044-1017	391	11,078	\$11,469
08-24633.018-R-1	13-35-122-044-1018	391	11,078	\$11,469

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property consists of an 83-year old, 18-unit, residential condominium building, situated on a 5,971 square foot parcel located in Jefferson Township, Cook County.

The appellant, via counsel, submitted evidence before the Board arguing overvaluation based on the sales of six of the subject's eighteen units. In support of this claim, the appellant included printouts from the recorder of deeds website for six sales. The evidence disclosed that the total purchase price for the units sold was \$755,000. The sales occurred during 2005 for prices ranging from \$117,000 to \$140,000. Next, the appellant deducted a personal property allocation of \$37,750, or 5%, reflecting an adjusted market value for the subject building of \$1,825,807.

The appellant's attorney submitted: a one-page brief; copies of recorder of deeds printouts; and a chart listing each unit with its corresponding permanent index number, unit number, percentage of ownership and assessment. Based on this evidence, the appellant requested a reduction in the subject's total assessment to \$164,323, which reflects a market value of \$1,825,807 when utilizing a 9% level of assessment.

The board of review submitted its "Board of Review-Notes on Appeal" disclosing the subject's total assessment of \$215,381. The assessment reflects a total market value of \$2,243,552 for the subject when the 2008 Illinois Department of Revenue's three-year median level of assessments of 9.6% for Class 2 property, such as the subject, is applied. The board of review also submitted a memo and sales analysis from Matt Panush, Cook County Board of Review Analyst. The board's analysis relied on three different sales in the subject's building. These sales occurred in 2007 and 2008 and sold for prices ranging from \$142,500 to \$200,000. Total consideration from the three sales was calculated at \$487,500. The board of review made a 9% allocation for personal property, then divided the adjusted market value by the percentage of interest of units sold, or 15.604%, and thus concluded an adjusted market value for the subject building of \$2,843,021. Based on the evidence presented, the board of review requested confirmation of the subject's assessment.

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

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. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3rd Dist, 2002); Winnebago County Board of Review v. Property Tax Appeal Board, 313 Ill.App.3d 179 (2nd Dist. 2000). Proof of market value may consist of an appraisal, a recent arms-length sale of the subject property, recent sales of comparable properties, or recent construction costs of the subject property. (86 Ill.Adm.Code §1910.65(c)) Having considered the evidence presented, the Board finds the appellant has not satisfied this burden and a reduction is not warranted.

The Board was provided with sales information by both parties. The appellant used six sales while the board of review presented three additional sales. All nine sales were of units located in the subject building. The Board finds both parties used a personal property allocation 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 the sales analysis, absent a personal property allocation, is accurate using both the appellant's and board of review's sales combined.

Based on evidence submitted, the Board finds that the subject property had a market value of \$2,263,700 for the 2008 assessment year. Since the market value has been determined, the 2008 three year median level of assessment of 9.6% as established by the Illinois Department of Revenue for Class 2 property shall apply. This yields an assessed value for the subject of \$217,315. As the current assessed value is below this value, this Board finds a reduction is not warranted based on the sales evidence contained in the record.

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.



Chairman



Member



Member



Member



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: July 18, 2014



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.