



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

APPELLANT: Shangri La Properties, LLC
DOCKET NO.: 09-26278.001-C-1
PARCEL NO.: 03-27-403-039-0000

The parties of record before the Property Tax Appeal Board are Shangri La Properties, LLC, the appellant, by attorney Michael E. Crane of Crane & Norcross, 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:

LAND: \$12,797
IMPR.: \$47,869
TOTAL: \$60,666

Subject only to the State multiplier as applicable.

ANALYSIS

The subject property consists of a 14,543 square foot lot which has been improved with a 2.5-story multi-family dwelling that is 37 years old. The dwelling contains 9 apartment units. The property is classified as a Class 3-14 multi-family residence under the Cook County Real Property Assessment Classification Ordinance. The property is located in Mount Prospect, Wheeling Township, Cook County.

The appellant in this appeal submitted limited documentation to demonstrate that the subject property's improvement was being inequitably assessed.¹ No dispute was raised with regard to the subject's land assessment. The appellant provided a brief outlining the argument along with limited data in a grid analysis on four comparables located in the same assigned neighborhood code by the assessor as the subject.

¹ In a brief, counsel argued the property's estimated market value reflects a 31% increase from 2008 which is excessive given "a substantial decline in market value for apartments over the past several years." The appellant submitted no evidence of market value beyond converting assessments into estimates of market value.

The comparables were described as multi-family dwellings which were 37 years old and each of which contained 9 apartment units. The comparables had total assessments ranging from \$54,523 to \$67,018 or from \$6,058 to \$7,446 per apartment unit including land. The subject has a total assessment of \$80,283 or \$8,920 per apartment unit including land. Based on this evidence the appellant requested the subject's total assessment be reduced to \$60,666 or \$6,741 per apartment unit including land.

The board of review did not submit its "Board of Review Notes on Appeal" or any evidence in support of its assessed valuation of the subject property.

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 Board further finds the evidence in the record supports a reduction in the subject's assessment.

The appellant argued assessment inequity in the subject's improvement assessment. Taxpayers who object to an assessment on the basis of lack of uniformity bear the burden of proving the disparity of assessments by clear and convincing evidence. Kankakee County Board of Review v. Property Tax Appeal Board, 131 Ill. 2d 1 (1989). The evidence must demonstrate a consistent pattern of assessment inequities within the assessment jurisdiction. After an analysis of the assessment data the Board finds a reduction commensurate with the appellant's request is warranted.

The Board finds the only evidence pertaining to the uniformity of the subject's improvement assessment was submitted by the appellant. The appellant provided limited data on four comparables. The appellant's evidence disclosed the subject had a total assessment of \$80,823 or \$8,920 per apartment unit including land, which is above the total assessment on a per apartment unit basis including land of the comparables on the record.

The board of review did not submit any evidence in support of its assessment of the subject property or to refute the evidence presented by the appellant as required by Section 1910.40(a) of the rules of the Property Tax Appeal Board. The Board has examined the information submitted by the appellant and finds, based on this limited evidence that was not refuted, a reduction in the assessed valuation of the subject property's improvement 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.

Donald R. Cuit

Chairman

K. L. Fern

Member

Frank A. Huff

Member

Mario Morris

Member

J. R.

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: June 22, 2012

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.