



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

APPELLANT: Jesus Covarrubias  
DOCKET NO.: 12-20711.001-R-1  
PARCEL NO.: 16-29-213-010-0000

The parties of record before the Property Tax Appeal Board are Jesus Covarrubias, the appellant, by attorney Julie Realmuto of 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:

**LAND:** \$2,450  
**IMPR.:** \$10,842  
**TOTAL:** \$13,292

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 2012 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 two-story multi-family building of masonry construction with 1,832 square feet of living area. The building is approximately 96 years old. Features of the property include a full unfinished basement and a two-car garage. The property has a 3,500 square foot site and is located in Cicero, Cicero Township, Cook County. The subject is classified as a class 2-11 apartment building with two to six

units under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables improved with a 1.5-story building and two, two-story buildings of frame or masonry construction that ranged in size from 1,536 to 2,268 square feet of living area. The buildings ranged in age from 85 to 133 years old. Two comparables had unfinished basements. The comparables had improvement assessments ranging from \$681 to \$8,437 or from \$.44 to \$3.72 per square foot of living area. Based on this evidence the appellant requested the subject's improvement assessment be reduced to \$6,265.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$13,292. The subject property has an improvement assessment of \$10,842 or \$5.92 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables improved with two, one-story buildings and two, two-story buildings of masonry construction that ranged in size from 913 to 1,832 square feet of living area. The buildings were either 93 or 96 years old. One comparable had a slab foundation and three comparables had full basements with two being finished with recreation rooms. Each comparable also had a two-car garage. Each comparable had the same neighborhood code as the subject property and three had the same classification code as the subject property. The comparables had improvement assessments that ranged from \$6,299 to \$11,460 or from \$6.07 to \$6.90 per square foot of living area.

#### **Conclusion of Law**

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this

burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of assessment equity to be appellant's comparables #3 and board of review comparables #1 and #2. These comparables had improvement assessments of \$3.72 and \$6.26 per square foot of living area. The subject's improvement assessment of \$5.92 per square foot of living area falls within the range established by the best comparables in this record. Less weight was given appellant's comparables #1 and #2 due to differences from the subject in age, style, size, features and/or construction. Less weight was given board of review comparables #3 and #4 due differences from the subject in style, size and/or features. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment 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.

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Chairman



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Member



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Member



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Acting Member



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Member

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Acting 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: February 19, 2016



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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.