



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

APPELLANT: Keith Dorman
DOCKET NO.: 12-33891.001-R-1
PARCEL NO.: 14-32-213-041-0000

The parties of record before the Property Tax Appeal Board are Keith Dorman, the appellant, by attorney John P. Brady, of Thomas M. Tully & Associates in Chicago; 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:

LAND: \$21,700
IMPR.: \$68,832
TOTAL: \$90,532

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 consists of two improvements situated on one parcel. Dwelling #1 is a two-story improvement of masonry exterior construction. Dwelling #1 is approximately 129 years old and has 2,206 square feet of living area. Features of the home include a full finished basement and central air conditioning. Dwelling #2 is a two-story improvement of masonry exterior construction. Dwelling #2 is approximately 129 years old and has 485 square feet of living area. Features of the home include a full unfinished basement. The subject property has a 3,100 square foot site and is located in Chicago, North Chicago Township, Cook County. The subjects are classified as a class 2-06 and 2-02 under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal.¹ The appellant stated that dwelling #1 had an improvement assessment of \$68,832 or \$31.20 per square foot of living area; however, that calculation was arrived at by dividing the combined improvement assessment for both of the subject's dwellings by dwelling #1's living area. In support of this argument the appellant submitted information on five equity comparables for dwelling #1. The appellant did not present any information regarding dwelling #2. The five equity comparables have the same neighborhood assessment code as the subject property. The comparables are improved with two-story dwellings of frame and masonry, frame or masonry exterior construction that range from 119 to 134 years old. The comparables had features with varying degrees of similarity when compared to the subject. The dwellings range in size from 2,354 to 2,602 square feet of living area and have improvement assessments ranging from \$49,118 to \$60,239 or from \$20.47 to \$25.59² per square foot of living area. Based on this evidence, the appellant requested the total assessment be reduced to \$67,945.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$73,985. Dwelling #1 has an improvement assessment of \$53,835 or \$24.40 per square foot of living area. Dwelling #2 has an improvement assessment of \$14,997 or \$30.92 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 for dwelling #1 and four equity comparables for dwelling #2.

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 that all of the comparables submitted for dwelling #1 have improvement assessments that ranged from \$32.17 to \$39.91 per square foot of living area. Dwelling #1 has an improvement assessment of \$24.40 per square foot of living area, thus demonstrating that dwelling #1 is not inequitably assessed. The Board also finds the appellant failed to present any evidence to dispute the assessment for dwelling #2. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvements were inequitably assessed and a reduction in the subject's assessment is not justified.

¹ The appellant submitted the PTAB1A marking comparable sales as the basis of the appeal. The appellant failed to submit sales information on the assessment grid analysis but provided assessment information.

² For some unknown reason, the appellant's attorney converted the improvement assessments of the comparables to reflect their estimated market values ranging from \$204.66 to \$255.90 per square foot of living area.

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



Acting 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: October 21, 2016



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.