



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

APPELLANT: Robert Steinbaugh  
DOCKET NO.: 14-34102.001-R-1  
PARCEL NO.: 14-33-105-014-0000

The parties of record before the Property Tax Appeal Board are Robert Steinbaugh, the appellant(s), by attorney Edward P. Larkin, Attorney at Law in Des Plaines; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, 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:** \$49,735  
**IMPR.:** \$100,000  
**TOTAL:** \$149,735

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 2014 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 contains two residential improvements situated on one parcel. Improvement #1 is a 129 year-old, two-story dwelling of frame and masonry construction. Improvement #2 is a 129 year-old, two-story dwelling of masonry construction. The parties differed as to the square footage of the living area for each improvement. The property has a 7,105 square foot site located in North Chicago Township, Cook County. It is a Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted descriptive and assessment information on four suggested equity comparables for only Improvement #1. The appellant argued that Improvement #1

contains 5,834 square feet of living area. The appellant did not submit information on Improvement #2. The appellant submitted a color photograph of the rear of the subject's garage and a plat of survey.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$156,498. Improvement #1 has an improvement assessment of \$16.38 per square foot of living area, but the board of review did not disclose the improvement assessment amount for Improvement #1. Instead, the board of review disclosed the total improvement assessment for both improvements. Improvement #2 has an improvement assessment of \$50.55 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted descriptive and assessment information on three suggested equity comparables for Improvement #1, and three suggested equity comparables for Improvement #2.

In rebuttal, the appellant argued that the board of review did not address the errors in square footage of the improvements.

At hearing, the appellant reiterated the argument that the square footage for each improvement was incorrect on the board of review's evidence. The appellant offered into evidence the same color photograph already part of the appellant's evidence. The Board allowed it into evidence as Appellant's Exhibit #1. The appellant reaffirmed the request for an assessment reduction.

### **Conclusion of Law**

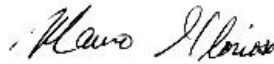
The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment 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 meet this burden of proof and a reduction in the subject's assessment is warranted.

The appellant's plat of survey does not clearly depict the exact square footage of the two-story Improvement #1 or the two-story Improvement #2. The appellant has not submitted any other evidence pertaining to that improvement's size, such as an appraisal or architectural drawings depicting the elevations of Improvements #1 and #2 with exact area measurements for each story. Consequently, the Board finds the appellant has not established by clear and convincing evidence that Improvement #1 contains 5,834 square feet and the size of Improvement #2.

The Board finds the best evidence of Improvement #1 assessment equity to be the board of review's comparable(s) #1, #2 and #3. These comparables had improvement assessments that ranged from \$12.16 to \$13.75 per square foot of living area. The assessment for Improvement #1 of \$16.38 per square foot of living area falls above the range established by the best comparables in this record. The Board finds the best evidence of Improvement #2 assessment

equity to be the board of review's comparables #1, #2 and #3. These comparables had improvement assessments that ranged from \$17.09 to \$19.92 per square foot of living area. The assessment for Improvement #2 of \$50.55 per square foot of living area falls above the range established by the best comparables in this record. Based on this record, the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and holds that a reduction in the subject's assessment 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. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member

Member



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: June 19, 2018



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 or years of the same general assessment period, as provided in Sections 9-125 through 9-225, 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 such subsequent year or years 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 OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

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.

PARTIES OF RECORD

AGENCY

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