



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

APPELLANT: Alejandra Rodriguez
DOCKET NO.: 16-20835.001-R-1
PARCEL NO.: 05-31-101-063-0000

The parties of record before the Property Tax Appeal Board are Alejandra Rodriguez, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC 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: \$8,889
IMPR.: \$66,123
TOTAL: \$75,012

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 2016 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 2-story frame dwelling containing 1,422 square feet of living area. The dwelling is 4 years old and features a partial basement with finished area and a 2-car garage. The subject is located in Glenview, New Trier Township, Cook County. It is classified as a Class 2-07 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 information on three, 2-story, Class 2-07 comparables. The appellant did not report the proximity of the comparables to the subject but disclosed one comparable has the same neighborhood code as the subject. The comparables range in size from 1,478 to 1,886 square feet of living area and range in age from 4 to 23 years old. The comparables feature basements, one with finished area, central air conditioning, and 1 or 2-car

garages. One comparable features a fireplace. The comparables have improvement assessments ranging from \$44,858 to \$86,206 or from \$30.35 to \$45.71 per square foot of living area. The appellant's attorney submitted a brief requesting the subject's total assessment be reduced to \$64,276. Based on this evidence the appellant requested the subject's 2016 improvement assessment be reduced to \$55,387 or \$38.95 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$75,012. The subject property has an improvement assessment of \$66,123 or \$46.50 per square foot of living area.

In support of the assessment the board of review submitted information on three, 2-story, Class 2-07 comparables having the same neighborhood code as the subject and located within 0.25 of a mile from the subject. The comparables are either 50 or 60 years old and range in size from 1,843 to 2,000 square feet of living area. They feature partial basements with finished areas, central air conditioning and 1, 2 or 2½-car garages. One comparable has a fireplace. The comparables have improvement assessments ranging from \$39,580 to \$43,714 or from \$21.48 to \$22.79 per square foot of living area. The board of review also reported the subject sold in March 2015, ten months prior to the assessment date at issue, for \$863,500. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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

The parties submitted six comparables for the Board's consideration. The Board finds neither party submitted comparables that are particularly similar to the subject. The appellant's comparables are more similar to the subject in age but appellant's comparables #1 and #2 have different neighborhood codes than the subject and comparables #2 and #3 are larger than the subject. The board of review comparables have features more similar to the subject but are improved with dwellings that are older and larger than the subject. However, the Board shall make a determination of the subject's correct assessment, regardless of the quality of the evidence. The Board finds both parties submitted comparables that have improvement assessments ranging from \$39,580 to \$86,206 or from \$21.48 to \$45.71 per square foot of living area. The subject's improvement assessment of \$66,123 or \$46.50 per square foot of living area falls within the range established by the comparables in the record on an overall basis and falls slightly above the range on a per square foot basis. Accepted real estate valuation theory provides, all other factors being equal, as the size of a property increases, its per unit value decreases. Likewise, as the size of a property decreases, its per unit value increases. Based on this analysis, the Board finds the subject's higher per square foot improvement assessment is well justified. After considering the multitude of adjustments to the comparables for differences to the

subject, the Board finds the subject's assessment is supported. Thus, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and no reduction in the subject's improvement assessment is warranted.

The Board further finds the subject's assessment is not only equitable, it is supported by the subject's recent sale price of \$863,500 which reflects an assessed value of \$86,350 or \$60.72 per square foot of living area at the Cook County Real Property Assessment Classification Ordinance level of assessment for Class 2 property of 10%.

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: April 23, 2019



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

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