



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

APPELLANT: Altisource Solutions  
DOCKET NO.: 17-20905.001-R-1  
PARCEL NO.: 12-13-306-043-0000

The parties of record before the Property Tax Appeal Board are Altisource Solutions, the appellant, by attorney Michael R. Davies, of Ryan Law LLP, 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:** \$ 5,576  
**IMPR.:** \$17,258  
**TOTAL:** \$22,834

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 2017 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 a one-story frame constructed dwelling with a partial finished attic. The dwelling contains 1,431 square feet of living area and is approximately 67 years old. Features of the home include a full unfinished basement and a two-car garage. The property has a 5,870 square foot site and is located in Norridge, Norwood Park Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant filed an appeal marking the basis of appeal as comparable sales however, the Section V grid analysis of the Residential Appeal petition lacks any recent sales data. In the absence of sufficient recent market value evidence to assert overvaluation of the subject property (86 Ill.Admin.Code §1910.65(c)(4)), the Board will analyze this appeal based on the evidence

wherein the appellant implies assessment inequity as the basis of this appeal concerning the improvement assessment; no dispute was raised with the subject's land assessment.

In support of this argument, the appellant submitted information on three equity comparables located in the same neighborhood code as the subject. The comparables consist of one-story class 2-03 dwellings of frame exterior construction; comparables #2 and #3 each have full or partial unfinished attics. The homes are either 62 or 63 years old and range in size from 1,405 to 1,439 square feet of living area. None of the comparables have basements, comparable #2 has central air conditioning and each comparable has either a 1.5-car or a 2-car garage. The comparables have improvement assessments ranging from \$13,296 to \$13,911 or from \$9.26 to \$9.90 per square foot of living area. Based on this evidence the appellant requested a reduced improvement assessment of \$13,838 or \$9.67 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 \$22,834. The subject property has an improvement assessment of \$17,258 or \$12.06 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four comparables with both equity and sales data where the sales data will not be examined as it is not responsive to the appellant's evidentiary submission. The comparables consist of one-story class 2-03 dwellings of frame exterior construction. The homes range in age from 62 to 84 years old and range in size from 1,126 to 1,494 square feet of living area. Each comparable has a full or partial basement, two of which have formal recreation rooms. Three dwellings have central air conditioning, two dwellings each have a fireplace and each comparable has either a one-car or a two-car garage. The comparables have improvement assessments ranging from \$16,531 to \$32,895 or from \$13.88 to \$22.02 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 parties submitted a total of seven comparable properties to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables which lack a basement as compared to the subject's full unfinished basement.

The Board finds the best evidence of assessment equity to be the board of review comparables which present varying degrees of similarity to the subject property. Both board of review comparables #1 and #2 are superior to the subject with finished basement areas which would require appropriate adjustments to make them more equivalent to the subject. The board of

review comparables have improvement assessments ranging from \$16,531 to \$32,895 or from \$13.88 to \$22.02 per square foot of living area. The subject's improvement assessment of \$17,258 or \$12.06 per square foot of living area falls within the range established by the best comparables in this record in terms of overall improvement assessment and below the range on square foot basis. Based on this record and after considering appropriate adjustments to the best comparables for differences when compared to the subject, 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. 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: July 20, 2021



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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Altisource Solutions, by attorney:  
Michael R. Davies  
Ryan Law LLP  
311 South Wacker Drive  
Mailbox #29  
Chicago, IL 60606

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602