



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

APPELLANT: Daniel Shereck
DOCKET NO.: 17-21677.001-R-1
PARCEL NO.: 15-36-204-045-0000

The parties of record before the Property Tax Appeal Board are Daniel Shereck, the appellant, by attorney John Rock, of Rock Fusco & Connelly, 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: \$ 7,722
IMPR.: \$25,397
TOTAL: \$33,119

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 dwelling of frame exterior construction with 1,744 square feet of living area. The dwelling is approximately 67 years old. Features of the home include a partial basement with a formal recreation room,¹ central air conditioning, a fireplace and a two-car garage. The subject also has other unknown improvement(s) that have not been specified by either party. The property has a 9,653 square foot site and is located in Riverside, Riverside Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

¹ Although the appellant indicated the subject's basement was unfinished, given the lack of details for the subject and comparables in the appellant's evidentiary submission, the Property Tax Appeal Board finds that the board of review submitted the best evidence of the subject's characteristics.

The appellant contends assessment inequity as the basis of the appeal concerning the improvement. 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 class 2-03 dwellings of stucco or masonry exterior construction. The homes range in age from 67 to 94 years old and range in size from 1,423 to 1,543 square feet of living area. Each dwelling has either a full or partial unfinished basement. Comparable #1 has central air conditioning. No data was provided in the grid analysis concerning fireplace and/or garage amenities. The comparables have improvement assessments ranging from \$17,018 to \$19,243 or from \$11.33 to \$12.82 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$19,760 or \$11.33 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 \$33,119. The subject property has an improvement assessment of \$25,397 or \$14.56 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables located in the same neighborhood code as the subject. The comparables consist of either 1-story or 1.5-story class 2-03 dwellings of stucco or masonry exterior construction. The homes range in age from 61 to 95 years old and range in size from 1,528 to 1,789 square feet of living area. Each dwelling has a full basement, one of which has a formal recreation room. Two of the comparables have central air conditioning and two of the comparables have one or two fireplaces. Each comparable has either a one-car or a two-car garage. The comparables have improvement assessments ranging from \$22,265 to \$32,060 or from \$14.57 to \$17.92 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 six equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #2 and #3 along with board of review comparable #2 due to their older ages when compared to the subject and/or the lack of characteristics in the appellant's submission which detracts from a detailed comparative analysis by the Board.

On this limited record, the Board finds the best evidence of assessment equity to be appellant's comparable #1 along with the board of review comparables #1 and #3 which are similar to the subject in location, class, dwelling size and some known features. These comparables had improvement assessments ranging from \$17,018 to \$32,060 or from \$11.33 to \$17.92 per square

foot of living area. The subject's improvement assessment of \$25,397 or \$14.56 per square foot of living area falls within the range of the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot basis. Based on this record and after considering 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: August 24, 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

Daniel Shereck, by attorney:
John Rock
Rock Fusco & Connelly, LLC
321 North Clark Street
Suite 2200
Chicago, IL 60654

COUNTY

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