



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

APPELLANT: Jozef Styrczula  
DOCKET NO.: 17-28655.001-R-1  
PARCEL NO.: 18-27-403-103-0000

The parties of record before the Property Tax Appeal Board are Jozef Styrczula, the appellant(s); 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:** \$3,870  
**IMPR.:** \$18,765  
**TOTAL:** \$22,635

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 an 8,600 square foot parcel of land improved with a 25-year old, frame and masonry, single-family dwelling. The property is located in Justice, Lyons Township, Cook County and is classified as a class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity as the basis of the appeal. In support of the equity argument, the appellant submitted three comparables located within the subject's neighborhood. These properties are described as multi-level, frame and masonry, single-family dwellings. They range: in age from 31 to 43 years; in size from 968 to 1,660 square feet of building area; and in improvement assessment from \$9.66 to \$14.60 per square foot of building area.

The appellant argues that the subject has been misclassified as a two-story dwelling when it is a multi-level dwelling and that the comparables should be multi-level properties. In addition, the

appellant asserts that the county has incorrectly listed the subject's square footage by including the subject's garage as livable space. In support of these arguments, the appellant included a copy of a letter from the Village of Justice disclosing that the subject in a split level residence, an affidavit from the appellant attesting that the subject is a 2-34 and contains 1,251 square feet of building area, and a copy of the plat of survey for the subject disclosing that it is a bilevel residence.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's total assessment is \$24,020 with an improvement assessment of \$20,150. The board of review lists the subject as a two-story dwelling containing 1,871 square feet of building area without further explanation.

In support of the assessment the board of review submitted three equity comparables located within the subject's neighborhood. These properties are described as multi-level, frame or frame and masonry, single-family dwellings. They range: in age from 19 to 31; in size from 1,246 to 1,389 square feet of building area; and in improvement assessment from \$16.02 or \$16.06 per square foot of building area.

### **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).

As to the subject's size, the Board finds the appellant submitted sufficient evidence to show the subject is a multi-level dwelling and contains 1,251 square feet of building area. The subject's size reflects a current improvement assessment of \$16.11 per square foot of building area.

The Board finds the best evidence of assessment equity to be the appellant's comparable #2 and the board of review's comparables #1 and #3. These comparables had improvement assessments ranging from \$14.60 to \$16.06 per square foot of building area. The Board give diminished weight to the remaining comparables for differences in construction or size. The subject's improvement assessment of \$16.11 per square foot of building area is above the range of the best comparables in this record. The Board finds that the appellant has proven by clear and convincing evidence that the subject property is inequitably assessed, and a reduction is warranted.

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.

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Chairman



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Member

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Member



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Member

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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: December 23, 2019



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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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