



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

APPELLANT: SFR CHI I, LLC
DOCKET NO.: 17-43184.001-R-1 through 17-43184.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are SFR CHI I, LLC, the appellant, by attorney Abby L. Strauss, of Schiller Law P.C., 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
17-43184.001-R-1	30-07-431-032-0000	975	3,561	\$4,536
17-43184.002-R-1	30-07-431-033-0000	1,015	3,561	\$4,576

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 masonry exterior construction with 1,181 square feet of living area. The dwelling is approximately 35 years old. Features of the home include a full unfinished basement, central air conditioning and a 2.5-car garage. The property has a 3,000 square foot site and is located in Calumet City, Thornton Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal concerning the improvement assessment. In support of this argument, the appellant submitted information on four equity comparables located in the same neighborhood code as the subject property. The comparables consist of class 2-03 dwellings of masonry exterior construction. The dwellings range in age from 52 to 62 years old and range in size from 1,076 to 1,402 square feet of living

area. Each comparable has a full basement, two of which have formal recreation rooms. Three comparables have central air conditioning and one comparable has a fireplace. Each comparable has from a 1-car to a 2.5-car garage. The comparables have improvement assessments ranging from \$3,590 to \$4,725 or from \$3.34 to \$3.68 per square foot of living area. Based on this evidence, the appellant requested a reduced combined improvement assessment of \$4,145 or \$3.51 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total combined assessment for the subject of \$9,112. The subject property has a combined improvement assessment of \$7,122 or \$6.03 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located within the same neighborhood code and the same block and within ¼ miles of the subject. The comparables consist of one-story class 2-03 dwellings of masonry exterior construction. The dwellings range in age from 41 to 46 years old and range in size from 1,152 to 1,330 square feet of living area. Each comparable has a full or partial unfinished basement. Two dwellings each have central air conditioning and one comparable has a fireplace. Three comparables have two-car garages. The comparables have improvement assessments ranging from \$7,343 to \$10,063 or from \$6.35 to \$7.57 per square foot of living area.

The board of review also submitted documentation depicting the 2014 purchase of the subject parcels via Warranty Deed for \$120,000 and a March 2018 sale of one of the two parcels on appeal herein for \$117,000 which transferred via Special Warranty Deed.

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 eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1, #2 and #4 which each differ from the subject in dwelling size or finished basement area as compared to the subject. The Board has given reduced weight to board of review comparable #4 due to its larger dwelling size and lack of a garage when compared to the subject.

The Board finds the best comparables in the record to be appellant's comparable #3 along with board of review comparables #1, #2 and #3. These four comparables have varying degrees of

similarity to the subject with improvement assessments that ranged from \$3,989 to \$7,722 or from \$3.67 to \$6.49 per square foot of living area. The subject's combined improvement assessment of \$7,122 or \$6.03 per square foot of living area falls within the range established by the best comparables in this record. After considering adjustments to the 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: June 8, 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

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