



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

APPELLANT: Richard La Grant
DOCKET NO.: 18-24376.001-R-1
PARCEL NO.: 01-26-300-035-0000

The parties of record before the Property Tax Appeal Board are Richard La Grant, the appellant, by attorney Noah J. Schmidt, of Schmidt Salzman & Moran, Ltd. 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: \$11,975
IMPR.: \$74,009
TOTAL: \$85,984

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 2018 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 1.5-story dwelling of frame and masonry exterior construction with 4,437 square feet of living area. The dwelling is approximately 15 years old. Features of the home include a full unfinished basement, a central air conditioning, two fireplaces and a 3-car garage. The property has a 68,433 square foot site located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables that are located within the same neighborhood code as the subject property. The comparables are improved with 1-story and 1.5-story class 2-04 dwellings of masonry or frame and masonry exterior construction ranging in size from 4,014 to 4,689 square feet of living area.

The dwellings range in age from 30 to 35 years old. Four comparables have full or partial unfinished basements and one comparable lacks a basement. Three comparables have central air conditioning and each comparable has from one to three fireplaces and either a 3-car or a 3.5-car garage. The comparables have improvement assessments ranging from \$5,862 to \$64,472 or from \$1.31 to \$14.00 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$60,742 or \$13.69 per square foot of living area.

The appellant submitted a copy of the 2018 final decision issued by the Cook County Board of Review disclosing the total assessment for the subject of \$85,984. The appellant reported the subject's improvement assessment in the appeal petition to be \$74,009 or \$16.68 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" for a different parcel than the subject. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables that are located within the same neighborhood code as the subject property. The comparables are improved with 1-story and 1.5-story class 2-04 dwellings of masonry or frame and masonry exterior construction ranging in size from 4,103 to 4,392 square feet of living area. The dwellings range in age from 1 to 32 years old and have full basements, two of which have finished area. Each comparable has central air conditioning, either one or two fireplaces and from a 1-car to a 4-car garage. The comparables have improvement assessments ranging from \$72,492 to \$78,322 or from \$17.22 to \$17.89 per square foot of living area. Based on the foregoing 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 nine suggested comparables for the Board's consideration. The Board finds all the parties' comparables but the board of review comparable #3 are dissimilar in age to the subject. Nevertheless, the Board gives less weight to the appellant's comparable #1 as it appears to be an outlier with its significantly lower improvement assessment when compared to the subject and other comparables in this record. Additionally, the board gives less weight to the board of review comparables #1 and #2 due to their dissimilar design and/or finished basement areas when compared to the subject.

The Board finds the remaining comparables present varying degrees of similarity to the subject in design, dwelling size and some features. These comparables have improvement assessments ranging from \$56,196 to \$75,630 or from \$13.56 to \$17.22 per square foot of living area. The subject's improvement assessment of \$74,009 or \$16.68 per square foot of living area falls within

the range established by the best comparables in this record. 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: December 21, 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

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