



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

APPELLANT: Hilliard Blank
DOCKET NO.: 18-35132.001-R-1
PARCEL NO.: 13-13-209-019-0000

The parties of record before the Property Tax Appeal Board are Hilliard Blank, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, 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: \$9,000
IMPR.: \$50,274
TOTAL: \$59,274

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 two-story multi-family building of frame exterior construction with 2,646 square feet of building area. The building is approximately 104 years old. Features of the building include a full unfinished basement, central air conditioning and a two-car garage. The property has a 3,750 square foot site located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 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 four equity comparables that are located within the same neighborhood code as the subject property. The comparables are improved with class 2-11 multi-family buildings of frame exterior ranging in size from 1,804 to 3,103 square feet of building area. The buildings range in age from 103 to

120 years old. The comparables have partial or full basements with one having an apartment. One comparable has central air conditioning. Each comparable has a two-car garage. The comparables have improvement assessments ranging from \$26,668 to \$54,420 or from \$12.24 to \$17.86 per square foot of building area. The appellant also submitted a copy of the Cook County Board of Review final decision dated April 1, 2019 disclosing the subject has a total assessment of \$59,274. The appellant reported that the subject has an improvement assessment of \$50,274 or \$19.00 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$43,077 or \$16.28 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" for a different parcel than the subject. The board of review's evidence included comparables for class 2-06 dwellings instead of class 2-11 buildings, like the subject. Furthermore, these comparables were located outside the subject's neighborhood.

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 eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #1 as it appears to be an outlier with its lower improvement assessment than the other comparables in the record. The Board gives less weight to the appellant's comparable #2 due to its basement apartment when compared to the subject. The Board gives less weight to the board of review comparables as these properties differ in class and neighborhood when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #4. These comparables are similar to the subject in location, class, age, building size and features. These comparables have improvement assessments of \$32,215 and \$54,420 or \$17.86 and \$17.54 per square foot of building area, respectively. The subject's improvement assessment of \$50,274 or \$19.00 is bracketed by the overall improvement assessments of the two best comparables in this record on an overall improvement assessment basis but falls above the improvement assessments on a per square foot basis. However, the subject's assessment is justified considering its newer age and central air conditioning when compared to the two best comparables in this record. After considering adjustments to the comparables for differences 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 improvement assessment based on inequity is not 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.



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: October 19, 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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