

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Andrew Sorensen
DOCKET NO.: 18-46391.001-R-1
PARCEL NO.: 24-14-112-101-0000

The parties of record before the Property Tax Appeal Board are Andrew Sorensen, the appellant; 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:** \$ 4,132 **IMPR.:** \$19,113 **TOTAL:** \$23,245

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 is comprised of a one-story dwelling of masonry exterior construction that is 64 years old. The dwelling contains 1,033 square feet of living area. The home features a crawl space foundation, central air conditioning and a 400 square foot two-car detached garage. The subject is a Class 2-03 property under the Cook County Real Property Assessment Classification Ordinance. The subject property is located in Lake Township, Cook County.

The appellant submitted evidence before the Property Tax Appeal Board claiming assessment inequity as the basis of the appeal. In support of the inequity claim, the appellant submitted a grid analysis of four assessment comparables located from .75 to 1 mile from the subject. The comparables consist of Class 2-03, one-story dwellings of masonry exterior construction that are from 54 to 64 years old. The comparables have a full finished or unfinished basement; one comparable has central air conditioning; and each comparable has a 400 square foot garage. The dwellings range in size from 1,165 to 1,360 square feet of living area. The comparables have

improvement assessments ranging from \$16,525 to \$18,671 or from \$12.92 to \$14.18 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject property of \$23,245. The subject property has an improvement assessment of \$19,113 or \$18.50 per square foot of living area. In support of the subject's assessment, the board of review submitted a grid analysis of four assessment comparables located in the same subarea and neighborhood as the subject. The comparables consist of one-story dwellings of masonry exterior construction that are from 54 to 66 years old. The comparables have a full finished or unfinished basement; two comparables have central air conditioning; one comparable has a fireplace; and three comparables have a two or two and one-half car garage. The dwellings range in size from 1,045 to 1,107 square feet of living area. The comparables have improvement assessments ranging from \$21,432 to \$22,653 or from \$20.13 to \$21.01 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 argued 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 failed to meet this burden of proof.

The record contains eight assessment comparables for the Board's consideration. The Board gave less weight to comparables #1, #2 and #3 submitted by the appellant. These comparables are 23% or 24% larger in dwelling size when compared to the subject. The Board finds the remaining five comparables submitted by the parties are more similar when compared to the subject in location, design, age, dwelling size and most features, but each comparable has a superior finished or unfinished basement when compared to the subject. These comparables have improvement assessments ranging from \$16,525 to \$22,653 or from \$14.18 to \$21.01 per square foot of living area. The subject property has an improvement assessment of \$19,113 or \$18.50 per square foot of living area, which falls within the range established by most similar assessment comparables contained in the record. After considering adjustments to the comparables for any differences when compared to the subject, the Board finds the subject's improvement assessment is supported. Therefore, no reduction in the subject's assessment is warranted.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20

Ill.2d 395 (1960). Although the comparables presented by the appellant disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence.

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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Dan De Kinie	Sarah Bokley
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:	September 15, 2020	
	Mauro M. Glorioso	
	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 <u>PETITION AND EVIDENCE</u> 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**

Andrew Sorensen 3706 W 107th St Chicago, IL 60655

# **COUNTY**

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