



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

APPELLANT: Michael Giza
DOCKET NO.: 19-32351.001-R-1
PARCEL NO.: 04-25-100-059-0000

The parties of record before the Property Tax Appeal Board are Michael Giza, the appellant(s), 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: \$17,323
IMPR.: \$50,907
TOTAL: \$68,230

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

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 2019 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 improved with a single-family, one-story dwelling of masonry construction containing 2,273 square feet of living area. As of the instant lien date the subject was approximately 64 years old. Features of the home include a partial formal recreation room basement, no air conditioning, and a two-car garage. The subject has a 16,901 square foot site and is in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant's appeal is based on assessment equity, and Appellant submitted information on five suggested comparable one-story dwellings. One is frame construction, two are frame-and-masonry, and two are masonry. Two lack air conditioning. As of the lien date, Appellant's comparables ages range from 50 to 77 years old. Appellant's comparables range in size from 2,219 square

feet to 2,475 square feet of living area and improvement assessments from \$14.11 to \$15.40 per square foot of living area. Each comparable has the same neighborhood code as the subject property, with no further evidence on proximity to subject.

The Cook County Board of Review (BOR) submitted its “Board of Review Notes on Appeal” wherein the subject’s final assessment of \$68,230 was disclosed. The subject has a total improvement assessment of \$50,907 or \$22.40 per square foot of living area.

The BOR submitted four equity comparables in support of its final assessment. The properties are described as one and 1.5-story dwellings, with three located within a quarter mile of the subject; the fourth is within the same subarea as the subject. All four BOR comparables share the same neighborhood code as the subject. Two are frame-and-masonry construction; two are masonry. One lacks air conditioning. As of the lien date the BOR comparables range from 60 to 81 years old. The comparables range from 2,010 to 2,315 square feet of building area and have improvement assessments from \$22.78 to \$25.53 per square foot of building area.

Conclusions of Law

Appellant contends assessment inequity as the basis of the appeal.

As a preliminary matter, Appellant also checked “Contention of Law” on the petition. However, Appellant only submitted argument and evidence that the subject property was inequitably assessed. Appellant’s petition lacks any other substantive legal argument. “If contentions of law are raised, the contesting party shall submit a brief in support of his position with the petition.” PTAB Rules §1910.30(h). Therefore, the Board will proceed on the basis of the evidence presented.

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 Appellant *did not meet* this burden of proof and a reduction in the subject's assessment *is not* warranted.

The Board finds the best evidence of assessment equity to be BOR comparables 1, 2, and 4 and Appellant comparable 4. All four comparables are similar to the subject’s size. BOR comparables 1 and 2 are masonry construction, same as the subject. BOR comparable 4 and Appellant comparable 4 are frame-and-masonry construction. The Board also takes note that the three BOR comparables are within a quarter mile of the subject. Appellant did not disclose the presented comparables’ proximities to the subject.

These comparables have improvement assessments that range from \$15.31 to \$23.54 per square foot of living area. The subject's improvement assessment of \$22.40 per square foot of living area falls within the range established by the best comparables in this record.

Based on this record, the Board finds 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: _____

November 19, 2024



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Michael Giza, by attorney:
Noah J. Schmidt
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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