



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

APPELLANT: Richard Fedrigon  
DOCKET NO.: 20-20340.001-R-1  
PARCEL NO.: 16-07-121-007-0000

The parties of record before the Property Tax Appeal Board are Richard Fedrigon, the appellant, by Amy C. Floyd, Attorney at Law 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:** \$4,218  
**IMPR.:** \$32,374  
**TOTAL:** \$36,592

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 2020 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 2-story multi-family dwelling of masonry exterior construction with 2,630 square feet of living area. The dwelling is approximately 108 years old. Features of the home include a full unfinished basement, two full baths and a two-car garage. The property has a 3,750 square foot site and is located in Oak Park, Oak Park 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 have the same assessment neighborhood code as the subject. The comparables are class 2-11 properties that are improved with 2-story multi-family dwellings of masonry, frame or frame and masonry exterior construction that range in size from 2,603 to 2,732 square feet of living area. The dwellings are 110 or 114 years old. Each comparable has a full

unfinished basement and two or three full baths. The comparables have improvement assessments ranging from \$30,223 to \$31,845 or from \$11.61 to \$11.72 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$30,718 or \$11.68 per square foot of living area.

The appellant also provided a copy of the Cook County Board of Review decision indicating the subject has a final assessment of \$36,592 for tax year 2020. The appeal petition disclosed for tax year 2020 that the subject had a land assessment of \$4,218 and an improvement assessment of \$32,374 or \$12.31 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal." The subject's total assessment reported in the notes on appeal differs from the total assessment depicted in the Cook County Board of Review decision provided by the appellant.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables that have the same assessment neighborhood as the subject and are located approximately ¼ of a mile from the subject property. The comparables are class 2-11 properties that are improved with 1.5-story or 2-story multi-family dwellings of frame or masonry exterior construction that range in size from 1,874 to 2,642 square feet of living area. The dwellings are 114 or 124 years old. The comparables each have a basement, one of which has finished area. Each comparable has two full baths and a two-car garage. Comparable #2 also has central air conditioning and comparable #3 has one half bath. The comparables have improvement assessments ranging from \$27,154 to \$41,191 or from \$14.32 to \$15.59 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

### **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 record contains seven suggested comparable properties for the Board's consideration. The Board has given less weight to board of review comparable #1 which has finished basement area, unlike the subject and to board of review comparable #2 due to its considerably smaller dwelling size and central air conditioning feature, when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's four comparables and board of review comparable #3, which are similar to the subject in location, dwelling size, design, age and some features. However, the Board finds the appellant's four comparables lack a garage, a feature of the subject, suggesting upward adjustments would be required to make these comparables more equivalent to the subject. Nevertheless, the comparables have improvement

assessments ranging from \$30,223 to \$36,963 or from \$11.61 to \$14.32 per square foot of living area. The subject's improvement assessment of \$32,374 or \$12.31 per square foot of living area falls within the range established by the best comparables in the record. Based on this record and after considering adjustments to the best comparables for differences from 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:

May 21, 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

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