



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

APPELLANT: Hampson Family Trust
DOCKET NO.: 20-20426.001-R-1
PARCEL NO.: 15-11-404-025-0000

The parties of record before the Property Tax Appeal Board are Hampson Family Trust, the appellant, by attorney Ciarra 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 **a reduction** 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: \$8,926
IMPR.: \$45,049
TOTAL: \$53,975

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 two-story dwelling of masonry exterior construction with 2,422 square feet of living area. The dwelling is approximately 72 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace and a 2-car garage.¹ The property has an approximately 9,650 square foot site and is located in River Forest, River Forest Township, Cook County. The subject is classified as a class 2-06 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. The appellant also checked "Contention of Law" on the appeal petition, however, in a brief, the appellant's counsel only argued that the subject property's improvement was

¹ The board of review indicated in its grid analysis that the subject has other improvements but did not provide a description of these improvements.

inequitably assessed. The appellant did not contest the subject's land assessment. In support of this argument the appellant submitted information on five equity comparables that have the same assessment neighborhood code as the subject.² The comparables are class 2-06 properties that are improved with two-story dwellings of frame, masonry or frame and masonry exterior construction ranging in size from 2,286 to 2,595 square feet of living area. The dwellings are 97 to 129 years old. Comparables #1 through #4 each have a full or partial basement, two of which have finished area and comparables #2, #3 and #4 each have a full or partial attic, one of which has finished area, according to the property characteristic printouts provided by the appellant. No foundation data was provided for comparable #5. Four comparables have central air conditioning, one comparable has a fireplace and four comparables each have a 2-car or a 2½-car garage. The comparables have improvement assessments that range from \$35,631 to \$42,249 or from \$15.59 to \$17.74 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$38,485 or \$15.89 per square foot of living area.

The appellant submitted a copy of the 2020 final decision issued by the Cook County Board of Review disclosing the total assessment for the subject of \$59,328. The subject property has an improvement assessment of \$50,402 or \$20.81 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal." In support of its contention of the correct assessment the board of review submitted information on four equity comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-06 properties that are improved with two-story dwellings of masonry, stucco or frame and masonry exterior construction ranging in size from 2,450 to 2,670 square feet of living area. The dwellings are 76 to 95 years old. Each comparable has central air conditioning, a fireplace and a 1½-car or a 2-car garage. The comparables have improvement assessments that range from \$44,245 to \$55,819 or from \$17.81 to \$22.78 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 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 a reduction in the subject's assessment is warranted based upon the evidence in the record.

The record contains a total of nine suggested equity comparables for the Board's consideration. The Board has given less weight to the appellant's comparables, as well as board of review

² The appellant submitted a property characteristic printout for one additional property, which was not included in the appellant's grid analysis nor was it discussed in the brief submitted by the appellant's counsel. Furthermore, no board of review certified assessment data for tax year 2020 was provided for this property, therefore, it will not be further addressed.

comparables #2 and #4 due to their considerably older dwelling ages when compared to the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #1 and #3, which are similar to the subject in location, dwelling size, design, age and some features. These best comparables have improvement assessments of \$44,245 and \$49,585 or \$17.81 and \$18.57 per square foot of living area. The subject's improvement assessment of \$50,402 or \$20.81 per square foot of living area is greater than the two best comparables in the record both in terms of total improvement assessment and on a per square foot basis. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is excessive. Therefore, based on this record the Board finds a reduction in the subject's assessment is 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

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: July 16, 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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