



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

APPELLANT: Andrew Riley
DOCKET NO.: 20-25155.001-R-1
PARCEL NO.: 16-06-308-008-0000

The parties of record before the Property Tax Appeal Board are Andrew Riley, the appellant, by attorney Patrick C. Turner, of Tabangay & Turner LLC in Elmhurst; 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: \$7,830
IMPR.: \$33,612
TOTAL: \$41,442

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 1.5-story dwelling of frame exterior construction with 1,811 square feet of living area. The dwelling is approximately 110 years old. Features of the home include an unfinished basement, central air conditioning and a 2-car garage. The property has a 6,960 square foot site and is located in Oak Park, Oak Park Township, Cook County. The subject is classified as a class 2-04 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 in the subject's assessment neighborhood code. The comparables are improved with class 2-04 dwellings of frame, masonry or stucco exterior construction ranging in size from 2,021 to 2,910 square feet of living area. The comparables range in age

from 100 to 106 years old. Each comparable has an unfinished basement, three comparables each have central air conditioning, two comparables each have one fireplace, and three comparables have a 2-car garage. The comparables have improvement assessments ranging from \$35,624 to \$44,441 or from \$13.38 to \$18.45 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$24,231 or \$13.38 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$41,442. The subject property has an improvement assessment of \$33,612 or \$18.56 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables that are located in the subject's assessment neighborhood code. Board of review comparable #4 is the same property as the appellant's comparable #3. The comparables are improved with 1.5-story dwellings of frame, stucco or frame and masonry exterior construction ranging in size from 2,021 to 2,540 square feet of living area. The comparables are from 104 to 112 years old. Each comparable has a basement with two comparables having finished area and either a 2-car or a 3-car garage. Two comparables each have central air conditioning, and three comparables each have one fireplace. Comparable #2 was reported as a renovated property. The comparables have improvement assessments ranging from \$34,478 to \$56,947 or from \$17.06 to \$22.42 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 parties submitted seven suggested comparables for the Board's consideration which includes one common comparable. The Board gives less weight to the appellant's comparable #1 which is significantly larger in dwelling size than the subject and also lacks a garage which is a feature of the subject property. The Board also gives less weight to the board of review comparables #1 and #2 which have basement finish, unlike the subject's unfinished basement. The Board also gives little weight to the parties' common comparable, appellant's comparable #3 and board of review comparable #4, as the parties reported two different improvement assessment amounts.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2 and #4 along with board of review comparable #3 which are more similar to the subject in location, age, and most features. These best comparables have improvement assessments ranging from \$40,772 to \$44,441 or from \$17.32 to \$18.45 per square foot of living area. The subject's improvement assessment of \$33,612 or \$18.56 per square foot of living area falls below the

range established by the best comparables on an overall basis and above the range on a per-square-foot basis. After considering the economies of scale and adjustments to the comparables for differences when compared to the subject, the Board finds the appellant did not prove by 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

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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