



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

APPELLANT: Christopher Frederick  
DOCKET NO.: 20-27319.001-R-1  
PARCEL NO.: 03-24-314-011-0000

The parties of record before the Property Tax Appeal Board are Christopher Frederick, the appellant, by Andrew S. Dziuk, 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:** \$5,311  
**IMPR.:** \$25,682  
**TOTAL:** \$30,993

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 frame and masonry exterior construction containing 2,241 square feet of living area. The dwelling is approximately 47 years old. Features of the home include a full basement with a formal recreation room, central air conditioning, one fireplace, 2½ bathrooms, and an attached 2.5-car garage. The property has a 9,237 square foot site located in Mount Prospect, Wheeling Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables consisting of class 2-78 properties improved with two-story dwellings of frame and masonry exterior construction that range in size from 2,217 to 2,379 square feet of living area

and in age from 50 to 52 years old. Each property has a partial or full basement with one having finished area, central air conditioning, 2 or 2½ bathrooms, and a 2-car attached garage. Three comparables have one fireplace. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$22,761 to \$24,576 or from \$10.27 to \$10.42 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$23,015.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$30,993. The subject property has an improvement assessment of \$25,682 or \$11.46 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four assessment equity comparables composed of class 2-78 properties improved with two-story dwellings of frame and masonry exterior construction that range in size from 2,109 to 2,585 square feet of living area and in age from 50 to 54 years old. Three comparables have a full or partial unfinished basement and one comparable has a slab foundation. Each property has 2 or 2½ bathrooms and a 2-car or a 2.5-car garage. Two comparables have central air conditioning and two comparables have one fireplace. The properties have the same assessment neighborhood code as the subject property and are located ¼ from the subject. Their improvement assessments range from \$24,654 to \$31,101 or from \$11.69 to \$12.86 per square foot of living area.

### **Conclusion of Law**

The appellant 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 information on eight equity comparables with the same neighborhood code and classification code as the subject property to support their respective positions. The Board gives less weight to board of review comparable #1 due to differences from the subject in foundation. The Board gives less weight to board of review comparables #3 and #4 due to differences from the subject in dwelling size. The Board finds the best evidence of assessment equity to be the appellant's comparables and board of review comparable #2 that range in size from 2,216 to 2,379 square feet of living area and in age from 50 to 52 years old. The comparables have varying degrees of similarity to the subject property in features requiring adjustments to make them more equivalent to the property under appeal. Four comparables have unfinished basements inferior to the subject's finished basement necessitating an upward adjustment; two comparables do not have a fireplace as does the subject requiring an upward adjustment; four comparables have a smaller garage than the subject indicating an upward adjustment is appropriate; and two comparables have ½ less bathroom than the subject requiring an upward adjustment. These comparables have improvement assessments that range from \$22,761 to \$28,498 or from \$10.27 to \$12.86 per square foot of living area. The subject's improvement assessment of \$25,682 or \$11.46 per square foot of living area falls within the

range established by the best comparables in this record and is well supported after considering the appropriate adjustments to make the comparables more equivalent to the subject property. Based on this record 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.

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Chairman



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Member



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Member



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Member



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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: March 18, 2025



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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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