



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

APPELLANT: Mary Casey
DOCKET NO.: 20-31000.001-R-1 through 20-31000.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Mary Casey, the appellant, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-31000.001-R-1	18-07-208-014-0000	4,782	53,029	\$57,811
20-31000.002-R-1	18-07-208-021-0000	2,898	22,726	\$25,624

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 two parcels improved with a 2-story dwelling of masonry exterior construction with 3,619 square feet of living area. The dwelling is approximately 20 years old. Features of the dwelling include an unfinished basement, central air conditioning, one fireplace, and a 3-car garage. The property was reported to have a 9,911 square foot site and is located in Western Springs, Lyons 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 assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables that are located in the same neighborhood code as the subject property. The comparables are improved with 2-story, class 2-78 dwellings of frame, masonry, or frame and masonry exterior construction ranging in size from 3,338 to 3,782 square feet of living area. The

comparables range in age from 52 to 61 years old. Four comparables each have an unfinished basement and one comparable lacks a basement foundation. Each comparable has central air conditioning, one fireplace, and a 2-car garage. The comparables have improvement assessments ranging from \$51,984 to \$60,833 or from \$15.55 to \$16.17 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$56,818 or \$15.70 per square foot of living area.

The appellant's submission included a copy of the "Cook County Board of Review" final decision dated March 22, 2021 which disclosed the subject has a total assessment for the two parcels of \$83,435. The "Addendum to Petition" which disclosed the subject's total assessment reflects a total land assessment of \$7,680 and a total improvement assessment of \$75,755 or \$20.93 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" for only one of the parcels under appeal. Nevertheless, in support of its contention of the correct assessment, the board of review submitted information on four equity comparables that are located in the same neighborhood code as the subject property. The comparables are improved with 2-story, class 2-78 dwellings of frame, masonry, or frame and masonry exterior construction ranging in size from 3,444 to 3,731 square feet of living area. The comparables range in age from 7 to 22 years old. The comparables each have a basement, two of which have finished area. Each comparable has central air conditioning and from a 2-car to a 3-car garage. Three comparables each have one or two fireplaces. The comparables have improvement assessments ranging from \$71,697 to \$89,878 or from \$20.74 to \$24.85 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 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 nine suggested comparables for the Board's consideration. The Board finds the best evidence of assessment equity to be the board of review comparables #3 and #4 which are overall most similar to the subject in location, design, age, dwelling size, and most features. The comparables have improvement assessments of \$72,200 and \$71,697 or \$20.74 and \$20.82 per square foot of living area, respectively. The subject's improvement assessment of \$75,755 or \$20.93 per square foot of living area falls above the two best comparables in this record. However, the subject's higher assessment is logical considering its size and/or amenities when compared to the two best comparables. The Board gives less weight to the parties' remaining comparables due to differences in age and/or basement finish when compared to the subject. Based on this record and after considering differences to the two 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: June 18, 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

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