



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

APPELLANT: Christine Harber
DOCKET NO.: 20-31971.001-R-1
PARCEL NO.: 14-29-216-023-0000

The parties of record before the Property Tax Appeal Board are Christine Harber, the appellant, by attorney 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: \$20,910
IMPR.: \$44,249
TOTAL: \$65,159

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 building of frame and masonry exterior construction with 2,700 square feet of building area. The building is approximately 126 years old. Features of the building include a concrete slab foundation, 4 full bathrooms, central air conditioning, and a 2-car garage.¹ The property has a 3,075 square foot site located in Chicago, Lake View 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 are located within the same neighborhood code as the subject property. The comparables are improved with two-story, class 2-11 buildings of frame exterior construction

¹ The appellant reported in Section III of the appeal petition that the subject property has 2-car garage, which was also reported by the board of review in its grid analysis.

ranging in size from 2,811 to 2,979 square feet of building area. The buildings are 127 or 130 years old. Two comparables have crawl space foundations, and two comparables have basements with one having apartment. The comparables have from 2 full to 3 full bathrooms, and one comparable has central air conditioning. No garage data was provided by the appellant in the grid analysis with respect to the subject or the comparables. The comparables have improvement assessments ranging from \$32,470 to \$41,187 or from \$10.93 to \$14.45 per square foot of building area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$35,235 or \$13.05 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$65,159. The subject property has an improvement assessment of \$44,249 or \$16.39 per square foot of building area. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables that are located within the same neighborhood code as the subject property. The comparables are improved with two-story, class 2-11 buildings of frame and masonry exterior construction ranging in size from 2,716 to 3,010 square feet of building area. The buildings range in age from 125 to 130 years old. The comparables have a basement with one having an apartment, and from 2 full and 2 half to 3 full and 1 half bathrooms. Two comparables each have central air conditioning, one comparable has a fireplace, and two comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$49,906 to \$52,679 or from \$16.58 to \$19.40 per square foot of building 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. The Board gives less weight to the appellant's comparable #1 and #4 as well as the board of review comparables that have basements, unlike the subject which lacks a basement.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2 and #3. These two comparables are relatively similar to the subject in location, age, building size, and lack a basement, but have varying degrees of similarity in other features. These two comparables have improvement assessments of \$36,070 and \$41,187 or \$12.11 and \$13.98 per square foot of building area. The subject's improvement assessment of \$44,249 or \$16.39 per square foot of building area falls above the two best comparables in the record. However, the subject's higher improvement assessment is reasonable after considering the varying adjustments to these comparables for differences in features to the subject property, including but not limited to the comparables' smaller bathroom count, lack of central air conditioning, and/or garage

capacity, if any, given the appellant did not provide any garage information for their comparables. Based on this evidence, 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: _____

October 15, 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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