

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Steven Wolf

DOCKET NO.: 20-32093.001-R-1 PARCEL NO.: 18-09-201-020-0000

The parties of record before the Property Tax Appeal Board are Steven Wolf, the appellant, by 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: \$4,218 **IMPR.:** \$20,120 **TOTAL:** \$24,338

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 one-story dwelling of masonry construction with 1,384 square feet of living area. The dwelling is approximately 64 years old. Features of the property include a full unfinished basement, central air conditioning, one bathroom, and a two-car detached garage. The property has a 6,750 square foot site located in LaGrange, Lyons Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity with respect to the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables improved with one-story dwellings of frame or masonry exterior construction that range in size from 1,527 to 1,764 square feet of living area. The homes are either 65 or 66 years old. These properties have either a crawl space or a slab foundation, one comparable has central air conditioning, and each property has one bathroom. The comparables have the same

assessment neighborhood code as the subject property. Their improvement assessments range from \$14,859 to \$16,343 or from \$9.26 to \$9.96 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$13,494.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$24,338. The subject property has an improvement assessment of \$20,120 or \$14.54 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 improved with one-story dwellings of masonry exterior construction that range in size from 1,153 to 1,346 square feet of living area. The homes range in age from 63 to 66 years old. Each comparable has a full basement with two having finished area, central air conditioning, one bathroom, and a two-car garage. These properties have the same classification code and neighborhood code as the subject property. The comparables are located along the same street and within the same block as the subject property. Their improvement assessments range from \$19,639 to \$21,830 or from \$15.85 to \$18.10 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 this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of assessment equity to be the board of review comparables as these properties are more similar to the subject property in location and features than are the comparables provided by the appellant. The board of review comparables have improvement assessments that range from \$19,639 to \$21,830 or from \$15.85 to \$18.10 per square foot of living area. The subject's improvement assessment of \$20,120 or \$14.54 per square foot of living area falls within the overall range but below the range on a square foot basis as established by the best comparables in this record. Less weight is given the appellant's comparables as none of the comparables has a basement as does the subject property, three of the comparables have no central air conditioning as does the subject property, and the appellant did not describe any of the comparables as having a garage as does 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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Member	Member
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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:	May 21, 2024
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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 <u>PETITION AND EVIDENCE</u> 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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APPELLANT

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COUNTY

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