



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

APPELLANT: Robert Schluser
DOCKET NO.: 20-32098.001-R-1
PARCEL NO.: 18-25-205-030-0000

The parties of record before the Property Tax Appeal Board are Robert Schluser, 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 **A Reduction** 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: \$2,970
IMPR.: \$11,460
TOTAL: \$14,430

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 brick exterior construction with 1,504 square feet of living area. The dwelling is 59 years old. Features of the home include a full basement and a two-car garage. The property has a 7,425 square foot site and is located in Bridgeview, 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 assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables improved with one-story, class 2-03 dwellings of frame or brick exterior construction that range in size from 1,432 to 1,788 square feet of living area. The homes are from 61 to 68 years old. Each comparable has either a crawl or partial basement with one having finished area, while one property has central

air conditioning. Two of the comparable have either a one or two-car garage.¹ The comparables have the same assessment neighborhood code as the subject and have improvement assessments that range from \$10,906 to \$13,628 or from \$7.29 to \$7.84 per square foot of living area.² The appellant requested the subject's improvement assessment be reduced to \$11,460.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$18,210. The subject property has an improvement assessment of \$15,240 or \$10.13 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables improved with one-story, class 2-03 dwellings of brick exterior construction that range in size from 1,134 to 1,152 square feet of living area. The homes are 58 or 62 years old. Each comparable has a crawl or full basement with a one or a two-car garage. The comparables have the same assessment neighborhood code as the subject and are located either on the same block or within one-fourth of a mile from the subject property. The comparables have improvement assessments that range from \$13,858 to \$15,342 or from \$12.22 to \$13.32 per square foot of living area.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains seven equity comparables submitted by the parties to support their respective positions. The Board gives less weight to the board of review's comparables due to differences from the subject dwelling in terms of size. The board of review's comparables are from 23% to 25% smaller than the subject dwelling with respect to living area. The Board gives less weight to the appellant's comparables #1 and #2 based on differences from the subject dwelling in terms of size and age. The Board finds the best evidence of assessment equity to be the remaining comparables. These comparables are relatively similar to the subject dwelling, although adjustments to these comparables to account for differences in some features and size, would be needed to make them more equivalent to the subject. These comparables are 61 and 66 years old, have 1,432 and 1,750 square feet of living area and have improvement assessments of \$10,906 and \$13,713 or \$7.62 and \$7.84 per square foot of living area, respectively. The subject's improvement assessment of \$15,240 or \$10.13 per square foot of living area is higher

¹ The Board notes the appellant's spreadsheet did not disclose whether the comparables have a garage, although the photographs provided by the appellant indicate that at least two of the dwellings have a garage.

² Although the appellant's comparables have the same assessment neighborhood code as the subject dwelling, the Board notes there was nothing in the record indicating the location of the comparables in relation to the subject property.

than the improvement assessments for the best comparables in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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

AGENCY

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