



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

APPELLANT: Richard Feely  
DOCKET NO.: 20-35202.001-R-1  
PARCEL NO.: 31-12-316-003-0000

The parties of record before the Property Tax Appeal Board are Richard Feely, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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:** \$6,573  
**IMPR.:** \$23,498  
**TOTAL:** \$30,071

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 2-story dwelling of masonry exterior construction with 3,758 square feet of living area. The dwelling is approximately 33 years old. Features of the home include a basement with finished area, central air conditioning, three fireplaces, and a 3.5-car garage. The property has a 13,147 square foot site and is located in Flossmoor, Rich 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 regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables located within the same assessment neighborhood code as the subject. The comparables are improved with class 2-78 homes of frame and masonry exterior construction ranging in size from 3,105 to 3,759 square feet of living area. The dwellings range in age from

31 to 41 years old. Each home has a basement, central air conditioning, and from a 2-car to a 3-car garage. Three homes have one or two fireplaces. The comparables have improvement assessments ranging from \$18,649 to \$21,794 or from \$5.80 to \$6.01 per square foot of living area.

The appellant submitted a final decision of the board of review disclosing the subject has a total assessment of \$30,071. The appellant indicated in the appeal petition that the subject has an improvement assessment of \$23,498 or \$6.25 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$22,323.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$28,535.<sup>1</sup> In support of its contention of the correct assessment the board of review submitted information on one equity comparable located within the same assessment neighborhood code as the subject. The comparable is improved with a 2-story, class 2-78 home of masonry exterior construction with 3,574 square feet of living area. The dwelling is 25 years old and features a basement, a fireplace, and a 3.5-car garage. This property has an improvement assessment of \$30,022 or \$8.40 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 record contains a total of five equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #4, which are less similar to the subject in dwelling size than the other comparables in this record. The Board also gives less weight to the board of review's comparable, which lacks central air conditioning that is a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 and #3, which are more similar to the subject in dwelling size, age, location, and some features, although these comparables lack finished basement area that is a feature of the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables have improvement assessments of \$21,668 and \$21,794 or \$6.00 and \$5.80 per square foot of living area, respectively. The subject's improvement assessment of \$23,498 or \$6.25 per square foot of living area falls above the best comparables in this record. Based on this record and after considering appropriate adjustments

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<sup>1</sup> The Board notes this total assessment differs from the board of review final decision presented by the appellant.

to the best comparables for differences from the subject, such as basement finish, 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

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: \_\_\_\_\_

July 16, 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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