



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

APPELLANT: John Schmitt
DOCKET NO.: 20-38366.001-R-1
PARCEL NO.: 18-09-303-026-0000

The parties of record before the Property Tax Appeal Board are John Schmitt, the appellant(s), by attorney John P. Brady, of Tully & Associates, 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 **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: \$8,542
IMPR.: \$72,131
TOTAL: \$80,673

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 19-year-old, two-story, single-family dwelling of masonry construction with 4,927 square feet of living area. The property has a 10,050 square foot site located in La Grange, Lyons Township, Cook County. The subject is classified as a class 2-08 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 seven suggested equity comparable properties. They were each improved with a single-family dwelling of either frame, masonry, or frame and masonry construction. The improvements ranged in improvement assessment from \$14.64 to \$16.87 per square foot of living area and from 3,924 to 4,800 square feet of living area. The appellant also included a copy of the board of review's written decision reflecting a total

assessment for the subject property of \$97,819. Based on its evidence submitted, the appellant requests the total assessment of the subject property be reduced to \$80,673.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$97,819. The subject property has an improvement assessment of \$89,277, or \$18.12 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on three suggested comparables. They were each improved with a two-story, single-family dwelling of either frame or masonry construction. They contained between 3,802 and 4,193 square feet of living area. They ranged in improvement assessment from \$18.73 to \$22.65 per square foot of living area.

This matter proceeded to hearing on February 10, 2025. The appellant's attorney stated that the appellant's comparables #1 and #2 are almost identical to the subject property. The appellant's attorney also stated that the board of review's comparables are far in proximity from the subject property. The board of review's representative rested on the evidence previously submitted.

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

The Board finds the best evidence of assessment equity to be *the appellant's comparables #1, #2, and #6*. These comparables were most similar to the subject property in living area square footage. All of the comparables submitted by both parties were of construction similar to the subject property and close in proximity to it. Greater weight was given to the comparables most similar to the subject property in living area square footage. They ranged in improvement assessment from \$14.64 to \$16.65 per square foot of living area. The subject's improvement assessment of \$18.12 per square foot of living area falls *above* the range established by the best comparables in this record. Based on this record 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: March 18, 2025



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

John Schmitt, by attorney:
John P. Brady
Tully & Associates, LTD.
33 North Dearborn Street
Suite 2450
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602