



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

APPELLANT: Nicholas Hammer
DOCKET NO.: 21-30409.001-R-1
PARCEL NO.: 17-08-250-026-0000

The parties of record before the Property Tax Appeal Board are Nicholas Hammer, the appellant, by Noah J. Schmidt, attorney-at-law of Schmidt Salzman & Moran, 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 **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: \$6,462
IMPR.: \$60,538
TOTAL: \$67,000

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 2021 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 three-story dwelling of masonry exterior construction containing 2,588 square feet of living area. The dwelling is approximately 19 years old. Features of the property include a slab foundation, central air conditioning, 2½ bathrooms, and a 2-car garage.¹ The property has a 1,077 square foot site located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-95 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 five equity

¹ The board of review described the property as having a slab foundation and 2½ bathrooms, which was not refuted by the appellant in rebuttal.

comparables.² The comparables are composed of class 2-95 properties improved with 2-story or 3-story dwellings of masonry exterior construction that range in size from 1,872 to 3,208 square feet of living area. The dwellings range in age from 18 to 31 years old. Two comparables have partial unfinished basements, one comparable has no basement, and the appellant did not disclose whether comparables #2 and #5 have basements. The comparables have 2 or 3 bathrooms. Two comparables have central air conditioning and two comparables have either a 1-car or a 2-car garage. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$16,610 to \$28,986 or from \$8.87 to \$15.26 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$22,955.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$67,000. The subject property has an improvement assessment of \$60,538 or \$23.39 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 composed of class 2-95 properties improved with three-story dwellings of masonry exterior construction that range in size from 2,252 to 2,574 square feet of living area. Each dwelling is 22 years old. Each comparable has a slab foundation, central air conditioning, 2½ or 3 bathrooms, and a 2-car garage. The comparables have the same assessment neighborhood code as the subject and are located in the same block or ¼ of a mile from the subject. Three comparables are located along the same street as the subject property. These properties have improvement assessments ranging from \$60,514 to \$70,712 or from \$23.51 to \$30.82 per square foot of living area. The board of review asserted the building assessed value per square foot for the comparables are the same or higher than the subject, which supports the correctness of the 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 Board finds the best evidence of assessment equity to be the board of review comparables that are more similar to the subject in dwelling size, features and/or location than are the comparables submitted by the appellant. The board of review comparables have improvement assessments that range from \$60,514 to \$70,712 or from \$23.51 to \$30.82 per square foot of living area. The subject's improvement assessment of \$60,538 or \$23.39 per square foot of living area falls within the overall improvement assessment range but is below the range on a per square foot of living area basis as established by the best comparables in this record. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence

² The appellant submitted copies of property characteristic sheets from the Cook County Assessor's Office for comparables #1, #3, #4 and #5 from which descriptive information was verified, added or corrected by this Board.

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: _____

May 20, 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

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