



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

APPELLANT: Estate of Camelia P. Petrozzini
DOCKET NO.: 21-30607.001-R-1
PARCEL NO.: 13-36-105-017-0000

The parties of record before the Property Tax Appeal Board are Estate of Camelia P. Petrozzini, the appellant, by attorney Dora Cornelio, 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: \$15,228
IMPR.: \$37,697
TOTAL: \$52,925

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 2-story apartment building of frame construction with 1,738 square feet of gross building area which is approximately 119 years old.¹ The building features two full baths, a full unfinished basement, and a 2-car garage. The property has a 3,384 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property² under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity

¹ Some descriptive information not provided by the appellant was drawn from the evidence submitted by the board of review and not refuted by the appellant via a rebuttal filing.

² Apartment building with 2 to 6 units, any age.

comparables located in the same assessment neighborhood code as the subject property. The comparables consist of 2-story or 3-story, class 2-11 apartment buildings of frame construction ranging in size from 1,680 to 1,848 square feet of gross building area and ranging in age from approximately 128 to 143 years old. The comparables are described as each having two full baths; three comparables have a full unfinished basement; and two comparables have either a 1.5-car or a 3.5-car garage. The comparables have improvement assessments that range from \$19,192 to \$23,750 or from \$11.21 to \$12.94 per square foot of gross building area. The appellant also submitted the property information sheets from the Cook County Assessor's database for each comparable property. Based on this evidence, the appellant requested a reduction to the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$52,925. The subject property has an improvement assessment of \$37,697 or \$21.69 per square foot of gross building area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located within the same assessment neighborhood code as the subject and within ¼ of a mile or within the same block as the subject property. The comparables consist of 2-story, class 2-11 apartment buildings of frame construction ranging in size from 1,666 to 1,960 square feet of gross building area and each being 131 years old. Each comparable features 2, 2½, or 3 bathrooms; three comparables have a full basement (two finished with an apartment or a recreation room); and each comparable has a 1-car, a 1.5-car, or a 2-car garage. The comparables have improvement assessments ranging from \$38,125 to \$47,075 or from \$21.89 to \$25.17 per square foot of gross building 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of nine equity comparables in support of their positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparables #1 and #5, along with board of review comparable #3 based on each of these buildings lacking a basement which is a feature of the subject building. Additionally, appellant's comparables #1, #2, and #5 lack a garage which is a feature of the subject and were therefore given less weight. The Board also gives reduced weight to appellant's comparable #2 which is less similar in age to the subject than the board of review comparables. The Board finds the remaining comparables to be similar to the subject in location, age, gross building area, basement foundations, and features. However, board of review comparables #1 and #2 have basements finished with a recreation room and an apartment, respectively, and therefore upward adjustments are necessary to these comparables due to the differences from the subject. The best comparables in the record have improvement assessments ranging from \$21,082 to \$47,075 or from \$12.55 to \$25.17 per square

foot of gross building area. The subject's improvement assessment of \$37,697 or \$21.69 per square foot of gross building area falls within the range established by the most similar comparables in the record in both in terms of overall improvement assessment and on a per square foot of gross building area basis.

After considering adjustments to the best comparables for any differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement 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: June 17, 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

Estate of Camelia P. Petrozzini, by attorney:
Dora Cornelio
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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