



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

APPELLANT: Michael Szczepanek
DOCKET NO.: 21-37496.001-R-1
PARCEL NO.: 14-30-106-026-0000

The parties of record before the Property Tax Appeal Board are Michael Szczepanek, 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: \$25,750
IMPR.: \$61,124
TOTAL: \$86,874

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 two-story dwelling of masonry exterior construction with 2,550 square feet of living area. The dwelling is approximately 108 years old. The home features a full basement finished with a formal recreation room¹ and 2 bathrooms. The property has a 2,575 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-06 property 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 comparables that have the same assessment neighborhood code as the subject, one of which is

¹ The board of review disclosed the subject dwelling has a formal recreation room in the basement, which was not refuted by the appellant.

located on the same street as the subject property. The submission included copies of the property characteristic printouts for each comparable that contain additional descriptive details. The comparables are class 2-06 properties improved with two-story or three-story dwellings of frame or masonry exterior construction ranging in size from 2,223 to 2,320 square feet of living area. The dwellings are from 112 to 135 years old. Each comparable has a full basement, two of which are finished with a formal recreation room, and one is finished with an apartment. Each comparable has either 2, 2½, 3 or 3½ bathrooms. Three comparables each have central air conditioning, two comparables each have one fireplace and four comparables each have either a 3.5-car or a 4-car garage. The comparables have improvement assessments that range from \$36,000 to \$42,000 or from \$16.19 to \$18.85 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$45,900 or \$18.00 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$86,874. The subject property has an improvement assessment of \$61,124 or \$23.97 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 that have the same assessment neighborhood code as the subject and are located within ¼ of a mile from the subject property. The comparables are class 2-06 properties improved with two-story or three-story dwellings of frame or masonry exterior construction ranging in size from 2,428 to 3,043 square feet of living area. The dwellings are from 110 to 133 years old. Three comparables each have a full basement, two of which are finished with a formal recreation room and one comparable has a crawl space foundation. Each comparable has 2, 2½ or 4 bathrooms. Three comparables have central air conditioning, one comparable has a fireplace and three comparables each have a 2-car garage. The comparables have improvement assessments that range from \$62,500 to \$74,750 or from \$24.13 to \$25.74 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 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 comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables #1, #2, #4 and #5, along with board of review comparables #2, #3 and #4 which have garages and/or central air conditioning, neither of which are features of the subject. Additionally, the appellant's comparable #5 and board of review comparable #4 are three-story dwellings when compared to the subject's two-story design

and board of review comparable #3 has a considerably larger dwelling size when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparable #3 and board of review comparable #1, which are overall more similar to the subject in location, dwelling size, design and many features. However, the Board finds both comparable dwellings are older in age, when compared to the subject and board of review comparable #1 lacks a basement recreation room, a feature of the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Conversely, board of review comparable #1 has two additional bathrooms, suggesting downward adjustments would be necessary. Nevertheless, these two comparables have improvement assessments of \$41,750 and \$65,000 or \$18.00 and \$24.13 per square foot of living area, respectively. The subject's improvement assessment of \$61,124 or \$23.97 per square foot of living is bracketed by the two best comparables in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, 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



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: _____

February 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

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