



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

APPELLANT: Kilian Emanuel
DOCKET NO.: 21-37916.001-R-1
PARCEL NO.: 03-25-101-009-0000

The parties of record before the Property Tax Appeal Board are Kilian Emanuel, the appellant, by Amy C. Floyd, Attorney at Law 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: \$5,232
IMPR.: \$21,415
TOTAL: \$26,647

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 one-story dwelling of frame and masonry exterior construction with 1,393 square feet of living area. The dwelling is approximately 52 years old. The home features a full unfinished basement, central air conditioning, and a 2-car garage.¹ The property has a 9,100 square foot site and is located in Mount Prospect, Wheeling Township, Cook County. The subject is classified as a class 2-03 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 four equity comparables that have the same assessment neighborhood code as the subject. The comparables

¹ The Board finds the subject has a two-car garage according to Section III of the of the appellant's appeal petition and the board of review's grid analysis, and the subject has an unfinished basement as reported by the board of review, which was unrefuted by the appellant.

consist of class 2-03 dwellings of frame and masonry exterior construction ranging in size from 1,531 to 1,735 square feet of living area. The dwellings are 56 or 58 years old. Three comparables have a crawl space or a concrete slab foundation, and one comparable has a partial basement but no data was provided if the basement has finished area, if any. Three comparables each have central air conditioning, and one comparable has one fireplace. The appellant did not disclose in the grid analysis whether the comparables have garages although the exterior photographs depict at least two comparables have a garage. The comparables have improvement assessments that range from \$16,824 to \$21,237 or from \$10.06 to \$12.88 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$16,702 or \$11.99 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 \$26,647. The subject property has an improvement assessment of \$21,415 or \$15.37 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 are located within the same assessment neighborhood code and the same block as the subject. The comparables consist of class 2-03, one-story dwellings of frame and masonry exterior construction containing either 1,326 or 1,393 square feet of living area. The dwellings are 52 to 56 years old. Each comparable has a partial or a full basement with one having finished area. One comparable has central air conditioning, and each comparable has either a 2-car or a 3-car garage. The comparables have improvement assessments that range from \$20,831 to \$22,399 or from \$15.71 to \$16.08 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 eight equity comparables for the Board's consideration. The Board has given less weight to the appellant's comparables which differ from the subject in dwelling size and/or foundation type. The Board has given less weight to the board of review comparable #1 due to its basement finish when compared to the subject's unfinished basement area.

The Board finds the best evidence of assessment equity to be the board of review comparables #2, #3 and #4. These comparables are overall more similar to the subject in location, design, age, and dwelling size, but still have other features with varying degrees of similarity to the subject. These three comparables have improvement assessments ranging from \$20,831 to \$22,150 or from \$15.71 to \$15.90 per square foot of living area. The subject's improvement

assessment of \$21,415 or \$15.37 per square foot of living area falls within the range established by the best comparables in the record on an overall basis and below the range on a per-square-foot basis. 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: _____

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

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

APPELLANT

Kilian Emanuel, by attorney:
Amy C. Floyd
Attorney at Law
57 E. Delaware
#3101
Chicago, IL 60611

COUNTY

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