

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Allison Lopez
DOCKET NO.: 21-38835.001-R-1
PARCEL NO.: 24-26-114-019-0000

The parties of record before the Property Tax Appeal Board are Allison Lopez, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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:** \$3,567 **IMPR.:** \$14,268 **TOTAL:** \$17,835

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 multi-level dwelling of frame and masonry exterior construction with 1,245 square feet of living area. The dwelling is 13 years old. Features of the home include a partial basement finished with a recreation room, 1 central air conditioning, one fireplace, and a 2-car garage. The property has a 7,511 square foot site and is located in Alsip, Worth Township, Cook County. The subject is classified as a class 2-34 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 four comparables located within the same assessment neighborhood code as the subject. The comparables consist of class 2-34 multi-level

<sup>&</sup>lt;sup>1</sup> The board of review disclosed the subject dwelling has a partial basement finished with a recreation room, which was unrefuted by the appellant.

dwellings of frame and masonry exterior construction ranging in size from 1,201 to 1,499 square feet of living area. The dwellings are from 23 to 49 years old. The dwellings were reported to have partial basements, but no data was provided if the basements have finished area. Each dwelling has central air conditioning and a 2-car garage. Two comparables each have one fireplace. The comparables have improvement assessments ranging from \$13,058 to \$16,151 or from \$10.77 to \$10.87 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$13,446 or \$10.80 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 \$17,835. The subject property has an improvement assessment of \$14,268 or \$11.46 per square foot of living area.

In support of the correct assessment, the board of review provided information on four comparables located within the same assessment neighborhood code as the subject and within the subject's same block or approximately ¼ of a mile from the subject. The comparables consist of class 2-34 multi-level dwellings of frame and masonry exterior construction ranging in size from 1,172 to 1,343 square feet of living area. The dwellings are from 16 to 34 years old. One comparable has crawl space foundation, and three comparables each have a partial basement finished with recreation room. Each comparable has central air conditioning and either a 2-car or a 2.5-car garage. Three comparables each have one fireplace. These comparables have improvement assessments ranging from \$13,572 to \$15,975 or from \$11.58 to \$12.17 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 record contains eight comparables submitted by the parties for the Board's consideration. The Board gives less weight to the appellant's comparables and board of review comparables #1 and #3 due to differences from the subject dwelling in age, size, and/or foundation type.

The Board finds the best evidence of assessment equity to be the board of review comparables #2 and #4 which are more similar to the subject in design, age, dwelling size, location and most features. These two comparables have improvement assessments of \$13,572 and \$15,006 or \$11.58 and \$12.17 per square foot of living area. The subject's improvement assessment of \$14,268 or \$11.46 per square foot of living area is bracketed by the two best comparables in the record in terms of an overall basis and below 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.

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	Chairman
C. R.	Robert Stoffen
Member	Member
Dan Dikini	Sarah Schler
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
	111-11716
	Mand
	Clade of the December Town Assessed December

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 <u>PETITION AND EVIDENCE</u> 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**

Allison Lopez, by attorney: Robert Rosenfeld Robert H. Rosenfeld & Associates, LLC 40 Skokie Blvd Suite 150 Northbrook, IL 60062

### **COUNTY**

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