

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Oscar Campos
DOCKET NO.: 21-38853.001-R-1
PARCEL NO.: 17-31-414-008-0000

The parties of record before the Property Tax Appeal Board are Oscar Campos, 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 <u>a reduction</u> 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: \$7,500 **IMPR.:** \$16,000 **TOTAL:** \$23,500

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 multi-family building of masonry exterior construction with 2,560 square feet of gross building area. The building is approximately 133 years old. Features of the building include a full unfinished basement and four bathrooms. The property has a 3,000 square foot site and is located in Chicago, South Chicago Township, Cook County. The subject is classified as a class 2-11 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 and property classification code as the subject, where one comparable is located on the same street as the subject property. The comparables are improved with multi-family buildings of masonry exterior construction ranging

in size from 2,565 to 2,880 square feet of gross building area. The buildings are from 105 to 133 years old. The comparables each have a full basement. No data was provided by the appellant concerning finished basement area. Each comparable reportedly has central air conditioning and three bathrooms. The appellant did not disclose whether any of the comparables have a garage. The comparables have improvement assessments that range from \$13,188 to \$18,500 or from \$5.14 to \$6.42 per square foot of gross building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$14,669 or \$5.73 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$28,697. The subject property has an improvement assessment of \$21,197 or \$8.28 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 that have the same assessment neighborhood code and property classification code as the subject. The comparables are located within the same block or approximately ¼ of a mile from the subject, one of which is on the same street as the subject property. The comparables are improved with two-story multi-family buildings of masonry exterior construction ranging in size from 2,016 to 2,214 square feet of gross building area. The buildings are from 97 to 121 years old. The comparables each have a full basement, two of which have finished area. Each comparable has two bathrooms and three comparables each have either a 1-car, a 1.5-car or a 2-car garage. The comparables have improvement assessments that range from \$20,750 to \$23,625 or from \$10.16 to \$10.70 per square foot of gross building 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted eight comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparable #1 and the four comparables submitted by the board of review, which differ from the subject building in size and/or age.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2, #3 and #4, which overall are more similar to the subject in location, building size, age and some features. The comparables have improvement assessments ranging from \$15,081 to \$18,500 or from \$5.32 to \$6.42. The subject's improvement assessment of \$21,197 or \$8.28 per square foot of gross building area falls above the range established by the best comparables in the record. After considering adjustments to the best comparables for differences when compared to the

subject, the Board finds the subject's improvement assessment is excessive. Based on this record, the Board finds a reduction in the subject's assessment is warranted.

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.

2	1. Fem
	Chairman
	assert Staffer
Member	Member
Dan Dikini	Sarah Bokley
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:	April 15, 2025
	14:10 16
	Mana
	

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

Oscar Campos, 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