



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

APPELLANT: Bernice & Vincent Johnson
DOCKET NO.: 21-39042.001-R-1
PARCEL NO.: 20-10-226-029-0000

The parties of record before the Property Tax Appeal Board are Bernice & Vincent Johnson, the appellants, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. 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: \$8,064
IMPR.: \$18,982
TOTAL: \$27,046

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 townhome of masonry construction with 2,128 square feet of living area. The dwelling is approximately 122 years old. The subject features one bathroom, a fireplace, and a full unfinished basement.¹ The property has a 2,304 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-10 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend inequity in improvement assessment as the basis of the appeal. In support of this argument, the appellants submitted information on three equity comparables located within the same assessment neighborhood code as the subject property. The comparables consist of similar class 2-10 townhomes of masonry construction containing either 2,138 or

¹ Some descriptive information was drawn from the information submitted by the board of review and not refuted by the appellants.

2,144 square feet of living area. The comparables are either 138 or 143 years old. The comparables each feature one or two bathrooms and a full unfinished basement. Comparable #3 has a 1-car garage. The comparables have improvement assessments ranging from \$11,835 to \$13,146 or from \$5.54 to \$6.13 per square foot of living area. Based on this evidence, the appellants requested a reduction in 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 \$27,046. The subject has an improvement assessment of \$18,982 or \$8.92 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 located within the same block as the subject property. The comparables consist of similar class 2-10 townhomes of masonry construction ranging in size from 2,010 to 2,162 square feet of living area. The comparables are either 119 or 123 years old and each comparable features one or two bathrooms and a full unfinished basement. Comparable #1 has a fireplace, and comparable #4 has a 2-car garage. The comparables have improvement assessments of either \$26,264 or \$26,939 and range from \$12.15 to \$13.40 per square foot of living area.

Conclusion of Law

The taxpayers contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of seven equity comparables in support of their positions before the Property Tax Appeal Board. The Board gives less weight to appellants' comparables due to their significant differences in age from the subject dwelling. The Board also gives less weight to board of review comparable #4 based on its 2-car garage which is a feature the subject lacks. The Board finds the best evidence of equity in assessment to be board of review comparables #1, #2, and #3 which are most similar to the subject in location, age, design, dwelling size, and features. The most similar comparables in the record have improvement assessments of either \$26,264 or \$26,936 and range from \$12.15 to \$13.40 per square foot of living area. The subject's improvement assessment of \$18,982 or \$8.92 per square foot of living area falls below the range established by the most similar comparables in this record both on a per square foot of living area basis and in terms of overall improvement assessment.

After considering adjustments to the best comparables for any differences from the subject, the Board finds the appellants did not demonstrate with clear and convincing evidence that the subject's improvement is inequitably assessed and, therefore, 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

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: January 21, 2025

Clerk of the Property Tax Appeal Board

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

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