

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Leticia Corral
DOCKET NO.: 21-40821.001-R-1
PARCEL NO.: 14-18-311-023-0000

The parties of record before the Property Tax Appeal Board are Leticia Corral, the appellant, by attorney Abby L. Strauss, of Schiller Law 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:** \$33,480 **IMPR.:** \$31,520 **TOTAL:** \$65,000

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 2,380 square feet of gross building area. The building is 105 years old. Features of the building include a full unfinished basement and a 2-car garage The property has a 3,720 square foot site and is located in Chicago, Lake View 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 comparables that have the same assessment neighborhood code as the subject. The comparables consist of class 2-11 multi-family buildings of frame or masonry exterior construction ranging in size from 2,257 to 2,544 square feet of gross building area. The buildings are from 107 to 119 years old

and have full basements. No data was provided concerning the basement finished area. Each comparable has a 2-car garage. The comparables have improvement assessments that range from \$17,444 to \$23,225 or from \$6.86 to \$9.92 per square foot of gross building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$21,658 or \$9.10 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 \$65,000. The subject property has an improvement assessment of \$31,520 or \$13.24 per square foot of gross building area.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same assessment neighborhood code as the subject. Comparables #1 through #3 are also located on the same block as the subject, two of which are located on the subject's same street. Comparable #4 is located within a quarter of a mile from the subject. The comparables consist of class 2-11 two-story multi-family buildings of masonry exterior construction ranging in size from 2,128 to 2,568 square feet of gross building area. The buildings are 100 to 108. The comparables each have a full unfinished basement and a 2-car garage. The comparables have improvement assessments that range from \$28,983 to \$34,520 or from \$13.44 to \$13.76 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 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 gives less weight to the appellant's comparable #1 which appears to be an outlier with its larger building size and lower improvement assessment relative to the other comparables in the record.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2, #3 and #4 as well as the board of review comparables which are relatively similar to the subject in age, building size, and most features. These seven comparables have improvement assessments ranging from \$22,225 to \$34,520 or from \$9.79 to \$13.76 per square foot of building area. The subject's improvement assessment of \$31,520 or \$13.24 per square foot of building area falls within the range established by the best comparables in the record. In addition, the subject's improvement assessment is supported by the board of review comparables #1 through #3 that have improvement assessment assessments ranging from \$28,983 to \$34,520 or from \$13.44 to \$13.66 per square foot of building area, which are located within the same block as the subject, including one of which that is identical to the subject in property characteristics. After considering adjustments to the seven most similar comparables for differences from 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.

Cha	airman
a R	Sovet Stoffen
Member	Member
Dan De Kinin	Sarah Bolley
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:	March 18, 2025
	111:10 16
	Man O
	Clark of the Donorate Tan Array I David

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**

Leticia Corral, by attorney: Abby L. Strauss Schiller Law P.C. 33 North Dearborn Suite 1130 Chicago, IL 60602

# **COUNTY**

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