



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

APPELLANT: Sean Ridgeway
DOCKET NO.: 21-41933.001-R-1
PARCEL NO.: 12-12-218-001-0000

The parties of record before the Property Tax Appeal Board are Sean Ridgeway, 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: \$9,866
IMPR.: \$24,134
TOTAL: \$34,000

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 dwelling of masonry exterior construction with 1,528 square feet of living area. The dwelling is approximately 79 years old. Features of the home include a partial unfinished basement, 1½ bathrooms, a fireplace and a 1-car garage. The property has a 4,933 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales that have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 4,500 to 5,625 square feet of land area. The comparables are class 2-05 properties that are improved with dwellings of masonry exterior construction ranging in size from 1,382 to 1,820 square feet of

living area. The dwellings are from 70 to 91 years old. The comparables each have a full basement. However, the appellant did not address whether there was basement finish. The appellant reported that each comparable has central air conditioning, either 1, 1½ or 2 bathrooms and a 1-car or a 2-car garage. Comparable #3 has a fireplace. The properties sold from June to September 2020 for prices ranging from \$265,000 to \$385,500 or from \$172.64 to \$211.81 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$30,209, reflecting a market value of \$302,090 or \$197.70 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$34,000. The subject's assessment reflects a market value of \$340,000 or \$222.51 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties that have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 4,275 to 5,400 square feet of land area. The comparables are improved with two-story dwellings of masonry or frame and masonry exterior construction ranging in size from 1,392 to 1,767 square feet of living area. The dwellings are from 71 to 82 years old. Three comparables each have a basement, two of which have finished area and comparable #4 has a concrete slab foundation. Comparable #2 has central air conditioning. Each comparable has either 1, 1½ or 2 bathrooms and three comparables each have a 1½-car or a 2-car garage. The properties sold from January to November 2021 for prices ranging from \$345,000 to \$550,000 or from \$228.08 to \$361.84 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). 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 comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables #3 and #4, as well as board of review comparable #4, which differ from the subject dwelling in size or age. Additionally, board of review comparable #4 has a concrete slab foundation, in contrast to the subject's basement foundation and this property also lacks a garage, a feature of the subject. The Board has also given less weight to board of review comparables #2 and #3, which have basement finish, unlike the subject.

The Board finds the best evidence of market value to be the appellant's comparables #1 and #2, along with board of review comparable #1. The Board finds these three comparables are similar

to the subject in location, dwelling size and age. However, all three comparables have a fewer number of fireplaces, the appellant's comparable #2 has a fewer number of bathrooms and board of review comparable #1 has no central air conditioning, when compared to the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Conversely, all three comparables have larger garage sizes, when compared to the subject, suggesting downward adjustments would be necessary. Nevertheless, these comparables sold in June 2020 to January 2021 for prices ranging from \$265,000 to \$455,000 or from \$172.64 to \$307.22 per square foot of living area, including land. The subject's assessment reflects a market value of \$340,000 or \$222.51 per square foot of living area, including land, which falls within the range established by the best comparable sales in record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is not warranted based on overvaluation.

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: _____

December 17, 2024



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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