



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

APPELLANT: Robert Molinari
DOCKET NO.: 21-44875.001-R-1
PARCEL NO.: 24-12-315-014-0000

The parties of record before the Property Tax Appeal Board are Robert Molinari, the appellant, by John W. Zapala, of the Law Offices of John Zapala, 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: \$2,600
IMPR.: \$15,400
TOTAL: \$18,000

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 2-story dwelling of frame construction with 1,485 square feet of living area. The dwelling is approximately 63 years old. Features of the home include an unfinished full basement and a 1.5-car garage. The property has a 2,600 square foot site and is located in Chicago, Lake 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 assessment inequity with respect to the subject's improvement as the basis of the appeal. However, the appellant's submission included a brief addressing overvaluation, which was clearly not the appellant's requested basis of the appeal. The appellant submitted sales information, a sales grid analysis, an adjusted sales grid analysis and assessment information, on five comparable properties located within the same neighborhood code as the subject. The comparables have sites ranging in size from 5,000 to 7,094 square feet of land area

that are improved with class 2-05 dwellings of masonry construction ranging in size from 990 to 1,770 square feet of living area. The dwellings range in age from 72 to 77 years old and have full or partial basements, one of which has finished area. Two comparables have central air conditioning, two comparables each have a fireplace, and each comparable has a 2-car garage. The comparables sold from February 2018 to June 2019 for prices ranging from \$180,000 to \$245,500 or from \$139 to \$182 per square foot of living area, including land, rounded. The comparables have improvement assessments ranging from \$17,000 to \$24,607 or from \$13.55 to \$24.86 per square foot of living area.

Based on this evidence the appellant requested the subject's improvement assessment be reduced to \$11,625 or \$7.83 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 \$18,000. The subject's assessment reflects a market value of \$180,000 or \$121.21 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 subject property has an improvement assessment of \$15,400 or \$10.37 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four comparable properties located within the same neighborhood code as the subject. The comparables are improved with 2-story dwellings of masonry or frame and masonry construction ranging in size from 1,510 to 1,971 square feet of living area. The dwellings are either 66 or 74 years old and have full or partial basements, one of which has finished area. Two comparables have central air conditioning, one comparable has a fireplace, and three comparables have either a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$19,502 to \$27,574 or from \$11.85 to \$13.99 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.

As an initial matter regarding the appellant's overvaluation evidence, the Board finds the appellant's sales are dated, having occurred greater than 18 months prior to the January 1, 2021 assessment date at issue and the appellant's adjusted sales grid analysis lacked quantitative market adjustments necessary to support the findings. Furthermore, subject dwelling is considerably newer than the appellant's comparable dwellings which sold for prices ranging from \$180,000 to \$245,500 or from \$139 to \$182 per square foot of living area, including land, rounded. The subject's assessment reflects a market value of \$180,000 or \$121.21 per square foot of living area, land included, which is equal to the lowest of the appellant's total comparable

sale prices but falls below the range of the appellant's comparable sale prices on a per square foot basis. After considering adjustments to the comparables for differences when compared to the subject, such as their older dwellings, the Board finds the subject's estimated market value as reflected by its assessment is supported and no reduction in the subject's assessment based on overvaluation is warranted.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1, #3 and #5, as well as the board of review's comparables #1 and #4. These comparables have varying degrees of similarity to the subject. The best comparables had improvement assessments that ranged from \$18,000 to \$23,984 or from \$11.85 to \$15.64 per square foot of living area. The subject's improvement assessment of \$15,400 or \$10.37 per square foot of living area falls below the range established by the best comparables in this record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is well supported. The Board gave less weight to the parties' remaining comparables, due to their differences in dwelling size when compared to the subject. Based on this record 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 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.

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: March 18, 2025



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

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