



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

APPELLANT: Chicago Title Land Trust #8002373037  
DOCKET NO.: 21-49539.001-R-1  
PARCEL NO.: 13-13-214-020-0000

The parties of record before the Property Tax Appeal Board are Chicago Title Land Trust #8002373037, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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:

<b>LAND:</b>	\$8,640
<b>IMPR.:</b>	\$52,338
<b>TOTAL:</b>	\$60,978

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 apartment building of masonry exterior construction with 3,172 square feet of gross building area. The building is 108 years old. Features of the building include a concrete slab foundation and a 1-car garage. The property has a 3,600 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on both unequal treatment in the assessment process as well as overvaluation concerning the subject property. In support of the inequity argument the appellant submitted information on four equity comparables located within the subject's assessment neighborhood. The comparables consist of 2-story class 2-11 buildings of masonry exterior construction ranging in size from 3,082 to 3,204 square feet of gross building area. The

buildings are 94 to 108 years old. Each building has either a full or partial basement and three comparables each have either a 1.5-car or 2-car garage. The comparables have improvement assessments ranging from \$44,000 to \$54,173 or from \$13.73 to \$17.55 per square foot of gross building area.

In support of the overvaluation argument, the appellant submitted information on three comparable sales located within the subject's assessment neighborhood. The comparables consist of 2-story dwellings of masonry exterior construction containing either 3,090 or 3,160 square feet of gross building area. The buildings are 102 to 108 years old. Each building has a full basement and one comparable has a 1-car garage. The parcels contain either 2,750 or 3,750 square feet of land area. The comparables sold from December 2021 to May 2022 for prices ranging from \$470,000 to \$677,500 or from \$152.10 to \$214.40 per square foot of gross building area, including land.

Based on this evidence, the appellant requested a reduced improvement assessment of \$39,610 or \$12.49 per square foot of gross building area and a reduced total assessment of \$48,250, for an estimated market value of \$482,500 or \$152.11 per square foot of gross building area, including land, when applying the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$77,000. The subject property has an improvement assessment of \$68,360 or \$21.55 per square foot of gross building area. The subject's total assessment reflects a market value of \$770,000 or \$242.75 per square foot of gross building area, including land, when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparables located within the subject's assessment neighborhood. The comparables consist of 2-story or 3-story class 2-11 buildings of masonry exterior construction ranging in size from 2,650 to 3,733 square feet of gross building area. The dwellings are 99 to 111 years old. Each building has a full basement, two of which have finished area. Two comparables have central air conditioning and three comparables each have either a 1.5-car or 2-car garage. The parcels each contain either 3,600 or 3,750 square feet of land area. The comparables have improvement assessments ranging from \$64,360 to \$82,000 or from \$21.97 to \$25.28 per square foot of gross building area. The comparables sold from April 2020 to June 2021 for prices ranging from \$895,000 to \$1,375,000 or from \$243.50 to \$502.56 per square foot of gross building area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant argued that the board of review's comparables differ substantially from the subject in size and that the board of review's evidence is therefore insufficient to meet its burden of proof.

### **Conclusion of Law**

The taxpayer contends in part 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 a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board finds the parties' comparables are not truly similar to the subject due to differences in foundation, nevertheless, the Board has given reduced weight to appellant's comparable #2, as well as the board of review comparables, which differ from the subject in design, building size, central air conditioning, or lack a garage, a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1, #3, and #4, which are similar to the subject in building size and some features. These comparables have improvement assessments that range from \$44,000 to \$54,173 or from \$13.73 to \$17.55 per square foot of gross building area. The subject's improvement assessment of \$68,360 or \$21.55 per square foot of gross building area is above the range established by the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is justified on equity grounds.

The taxpayer also 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 parties submitted seven comparable sales to support their respective positions before the Property Tax Appeal Board. The comparables sold from April 2020 to May 2022 for prices ranging from \$470,000 to \$1,375,000 or from \$152.10 to \$502.56 per square foot of gross building area, including land. The Board finds the subject's assessment as reduced herein reflects a market value of \$609,780 or \$192.24 per square foot of living area, including land, which falls within the range established by the comparable sales in this record, and no further reduction in the subject's assessment is warranted given the reduction for equity considerations.

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.



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Chairman



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Member



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Member



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Member

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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



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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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