



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

APPELLANT: Jacob Mueller
DOCKET NO.: 21-49664.001-R-1
PARCEL NO.: 13-09-103-018-0000

The parties of record before the Property Tax Appeal Board are Jacob Mueller, 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 **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: \$9,374
IMPR.: \$28,198
TOTAL: \$37,572

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 1.5-story dwelling of masonry exterior construction with 844 square feet of living area. The dwelling is approximately 68 years old. Features of the home include a full basement with finished area, central air conditioning, and a 2-car garage.¹ The property has a 4,687 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-02 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 eight equity comparables located within the subject's assessment

¹ The board of review reported that the subject has a formal recreation room, which was not refuted by the appellant in rebuttal.

neighborhood.² The comparables consist of 1-story or 1.5-story class 2-02 dwellings of masonry, stucco, or frame and masonry exterior construction ranging in size from 838 to 936 square feet of living area. The homes are 60 to 104 years old. Each dwelling has a full or partial basement and two comparables each have either a 1-car or 2-car garage. The comparables have improvement assessments ranging from \$13,020 to \$17,750 or from \$14.29 to \$19.15 per square foot of living area.

In support of the overvaluation argument, the appellant submitted information on four comparable sales located within the subject's assessment neighborhood. The comparables consist of 1-story class 2-02 dwellings of masonry exterior construction ranging in size from 866 to 917 square feet of living area. The homes are 63 to 69 years old. Each dwelling has a full basement and either a 1-car, 1.5-car, or 2-car garage. One comparable has central air conditioning. The parcels range in size from 3,000 to 3,750 square feet of land area. The comparables sold from March to May 2022 for prices ranging from \$200,000 to \$295,000 or from \$230.95 to \$321.70 per square foot of living area, including land.

Based on this evidence, the appellant requested a reduced improvement assessment of \$10,116 or \$11.99 per square foot of living area and a reduced total assessment of \$19,490, for an estimated market value of \$194,900 or \$230.92 per square foot of living 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 \$37,572. The subject property has an improvement assessment of \$28,198 or \$33.41 per square foot of living area. The subject's total assessment reflects a market value of \$375,720 or \$445.17 per square foot of living 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 three comparables, one of which is located within the subject's assessment neighborhood. The comparables consist of 1-story class 2-02 dwellings of frame or masonry exterior construction ranging in size from 588 to 950 square feet of living area. The dwellings are 61 to 118 years old. Each dwelling has a full basement and two comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$10,390 to \$23,800 or from \$16.10 to \$25.05 per square foot of living area. The parcels range in size from 3,075 to 3,906 square feet of land area. The comparables sold from June 2019 to August 2021 for prices ranging from \$282,144 to \$442,000 or from \$465.26 to \$490.31 per square foot of living 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 support the appellant's contention that the property is overassessed.

² For ease of reference, the comparables have been renumbered #1 through #8.

Conclusion of Law

The taxpayer contends in part 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 parties submitted a total of seven comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparables #2 and #3, which lack a garage or differ from the subject in dwelling size.

The Board finds the best evidence of market value to be the appellant's comparable sales and board of review comparable #1, which are similar to the subject in age, dwelling size, and some features. These comparables sold for prices ranging from \$200,000 to \$442,000 or from \$230.95 to \$465.26 per square foot of living area, including land. The subject's assessment reflects a market value of \$375,720 or \$445.17 per square foot of living area, including land, which is within the range of the best comparable sales in this record. Based on this evidence 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 justified based on overvaluation.

The taxpayer also 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 a total of 12 equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1 through #3, #5, #7 and #8, which lack a garage, a feature of the subject. The Board also gives reduced weight to board of review comparables #2 and #3, which lack a garage or differ from the subject in dwelling size.

The Board finds the best evidence of assessment equity to be appellant's comparables #4 and #6 along with board of review comparable #1, which are similar to the subject in dwelling size and some features. These comparables have improvement assessments that range from \$15,826 to \$23,800 or from \$17.80 to \$25.05 per square foot of living area. The subject's improvement assessment of \$28,198 or \$33.41 per square foot of living area is above the range established by the best comparables in this record. However, the Board finds the subject's higher assessment to be logical given the subject's central air conditioning and finished basement, features the best comparables lack. Based on this record and after considering adjustments to the best comparables for differences when compared to 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 on equity grounds.

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: _____

February 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

AGENCY

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