



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

APPELLANT: Bozena Maciuch
DOCKET NO.: 21-50106.001-R-1
PARCEL NO.: 13-20-203-021-0000

The parties of record before the Property Tax Appeal Board are Bozena Maciuch, the appellant, by attorney Donald T. Rubin, of Golan Christie Taglia LLP 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: \$10,676
IMPR.: \$26,323
TOTAL: \$36,999

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 2,384 square feet of gross building area. The building is 101 years old. Features of the building include a full basement with finished area and a two-car garage. The property has a 3,813 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 contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on six equity comparables located from 1.1 to 2.2 miles from the subject. The comparables consist of 1.5-story or 2-story class 2-11 buildings of frame or frame and masonry exterior construction ranging in size from 2,005 to 2,660 square feet of gross building area. The buildings are 92 to 101 years

old. Each building has a full basement with finished area and either a 1.5-car or 2-car garage. One comparable has central air conditioning and one comparable has a fireplace. The comparables have improvement assessments ranging from \$11,266 to \$14,416 or from \$5.41 to \$5.82 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment of \$13,350 or \$5.60 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 \$36,999. The subject property has an improvement assessment of \$26,323 or \$11.04 per square foot of gross building area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables located within .25 of a mile of the subject. The comparables consist of 2-story class 2-11 buildings of masonry exterior construction ranging in size from 2,328 to 2,472 square feet of gross building area. The buildings are 98 to 118 years old. Each building has a full basement. One comparable has central air conditioning and three comparables each have either a 2-car or 2.5-car garage. The comparables have improvement assessments ranging from \$25,086 to \$39,750 or from \$10.76 to \$16.08 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 a total of ten equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the comparables submitted by the appellant, which are each located more than one mile from the subject. The board gives less weight to board of review comparable #1, which lacks a garage, a feature of the subject. The Board also gives diminished weight to board of review comparable #4, which appears to be an outlier due to its higher improvement assessment in relation to the other comparables in the record.

The Board finds the best evidence of assessment equity to be board of review comparables #2 and #3, which are similar to the subject in age, location, building size, and most features. These comparables have improvement assessments of \$25,086 and \$25,608 or \$10.76 and \$11.00 per square foot of gross building area. The subject's improvement assessment of \$26,323 or \$11.04 per square foot of gross building area is above the two best comparables in this record. However, the subject's higher improvement assessment is logical given the subject's finished basement, a feature the two 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.

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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