



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

APPELLANT: Rodolfo Martinez
DOCKET NO.: 21-50331.001-R-1
PARCEL NO.: 13-14-423-022-0000

The parties of record before the Property Tax Appeal Board are Rodolfo Martinez, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd. 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: \$15,625
IMPR.: \$26,596
TOTAL: \$42,221

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 multi-family building of masonry exterior construction with 2,180 square feet of building area. The building is approximately 99 years old. Features of the building include a basement with finished recreation room,¹ central air conditioning and a 2-car garage. The property has an approximately 3,125 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 five equity comparables located in the same assessment neighborhood code as the subject property. The

¹ The Board finds the best description of the subject property was found in the grid analysis submitted by the board of review which was not refuted by the appellant.

comparables are improved with 1.5-story or 2-story² class 2-11 multi-family buildings of frame or frame and masonry exterior construction ranging in size from 2,116 to 2,392 square feet of building area. The buildings range in age from 115 to 123 years old. Each comparable has a basement, four of which are finished with either a recreation room or an apartment. One building has central air conditioning and four properties have from a 1.5-car to a 2.5-car garage. The comparables have improvement assessments ranging from \$12,304 to \$13,992 or from \$5.55 to \$5.85 per square foot of building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$12,404 or \$5.69 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$42,221. The subject property has an improvement assessment of \$26,596 or \$12.20 per square foot of building area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables located in the same assessment neighborhood code as the subject property. The comparables are improved with 2-story class 2-11 multi-family buildings of masonry exterior construction ranging in size from 2,190 to 2,406 square feet of building area. The buildings range in age from 95 to 108 years old. Each comparable has a basement, one of which is finished with a recreation room. Three properties have either a 1.5-car or a 2-car garage. The comparables have improvement assessments ranging from \$28,875 to \$33,638 or from \$12.50 to \$15.36 per square foot of building area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

Conclusion of Law

The appellant 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 nine equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables which are from 16 to 24 years older in age when compared to the subject. The Board also gives less weight to board of review comparable #2 which lacks a garage amenity in contrast to the subject's 2-car garage.

The Board finds the best evidence of assessment equity to be board of review comparables #1, #3 and #4 which are more similar to the subject in location, age, design and building size. However, two of these properties lack finished basement area suggesting an upward adjustment is needed to make these properties more equivalent to the subject. These best comparables have improvement assessments ranging from \$28,875 to \$33,368 or from \$12.50 to \$15.36 per square

² Some property characteristics for the appellant's comparables were corrected or amended with information found in the Property Search Details submitted by the appellant.

foot of building area. The subject's improvement assessment of \$26,596 or \$12.20 per square foot of building area falls below the range established by the best comparables in this record. After considering appropriate adjustments to the comparables for differences from 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: _____

January 21, 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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