



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

APPELLANT: Granero Property I LLC
DOCKET NO.: 21-50542.001-R-1
PARCEL NO.: 13-09-406-018-0000

The parties of record before the Property Tax Appeal Board are Granero Property I LLC, the appellant, by attorney Abby L. Strauss of Schiller Law 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: \$10,584
IMPR.: \$46,416
TOTAL: \$57,000

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 two improvements situated on one parcel.¹ Improvement #1 is described as a class 2-04, 1.5-story dwelling of frame exterior construction with 2,228 square feet of living area. The dwelling is approximately 97 years old. Features of the home include a full unfinished basement and two bathrooms. The board of review described Improvement #2 as a class 2-02, 1-story dwelling of frame exterior construction with 688 square feet of living area. The home features a concrete slab foundation, central air conditioning and one bathroom, according to the property characteristic printout provided by the board of review. The parcel has a 3,780 square foot site and is located in Chicago, Jefferson Township, Cook County.

¹ The board of review disclosed in the "Board of Review – Notes on Appeal" that there are two improvements on the property, a class 2-04 dwelling and also a class 2-02 dwelling which was not disclosed or refuted by the appellant. For ease of reference, the Board has numbered the class 2-04 dwelling as improvement #1 and the class 2-02 dwelling as improvement #2.

The appellant contends assessment inequity with respect to only Improvement #1 as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables that have the same assessment neighborhood code as the subject, one of which is located on the same street as the subject property. The comparables are class 2-11 properties that are improved with multi-family dwellings of frame and masonry exterior construction ranging in size from 2,746 to 3,203 square feet of living area. The dwellings are from 87 to 121 years old. Two comparables have a concrete slab foundation and three comparables have either a full or partial basement. No data was provided by the appellant concerning finished basement area. Two comparables have central air conditioning and comparable #1 has a fireplace. Each comparable has from two to four bathrooms and either a two-car or a four-car garage. The comparables have improvement assessments that range from \$21,360 to \$29,830 or from \$7.56 to \$9.31 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$57,000. The subject property has a combined total improvement assessment of \$46,416 for both Improvement #1 and Improvement #2 or \$15.92 per square foot of living area when using the combined total square footage of 2,916 square feet for both dwellings.

In support of its contention of the correct assessment for Improvement #1, the board of review submitted information on three equity comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-04 properties that are improved with 1.5-story dwellings of frame or masonry exterior construction ranging in size from 1,849 to 2,147 square feet of living area. The dwellings are 97 or 101 years old. The comparables each have a full basement, one of which has finished area. Two comparables have central air conditioning. Each comparable has either two or three bathrooms and a two-car garage. The comparables have improvement assessments that range from \$28,180 to \$34,500 or from \$15.24 to \$17.76 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.

The parties submitted seven suggested comparables for the Board's consideration. The Board finds none of the comparables are truly similar to subject, as none have a separate second dwelling, like the subject. The comparables have the same assessment neighborhood code as the subject but have varying degrees of similarity in dwelling size, age and features, when compared

to the subject. Nevertheless, the comparables have improvement assessments ranging from \$21,360 to \$34,500 or from \$7.56 to \$17.76 per square foot of living area. The subject's improvement assessment of \$46,416 or \$15.92 per square foot of living area is greater than the comparables contained in the record in terms of total improvement assessment but within the range on a per square foot basis. The subject's higher overall improvement assessment appears to be logical given it has a separate second dwelling. Therefore, 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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