



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

APPELLANT: Ricardo Rodriguez
DOCKET NO.: 21-51045.001-R-1
PARCEL NO.: 13-26-424-005-0000

The parties of record before the Property Tax Appeal Board are Ricardo Rodriguez, the appellant, by Dora Cornelio, attorney-at-law 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: \$15,312
IMPR.: \$31,579
TOTAL: \$46,891

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 is improved with a two-story building of masonry construction containing 2,746 square feet of building area. The building is approximately 107 years old. Features of the property include a full basement with a recreation room, 4½ bathrooms and a 2.5-car garage.¹ The property has a 4,375 square foot site located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-11 apartment building under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-11 properties improved with 1.5-story, 2-story, or 3-story

¹ The board of review described the subject as having a full basement with a recreation room and having 4½ bathrooms, which was not refuted by the appellant.

buildings of frame or masonry construction that range in size from 2,539 to 2,880 square feet of building area.² The buildings range in age from 98 to 124 years old. Four comparables have full basements finished with either a recreation room or an apartment and four comparables have a two-car garage. These properties also have two to four bathrooms. The comparables have the same assessment neighborhood code as the subject property. These properties have improvement assessments ranging from \$12,508 to \$18,455 or from \$4.71 to \$6.58 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$15,542.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$46,891. The subject property has an improvement assessment of \$31,579 or \$11.50 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 composed of class 2-11 properties improved with two-story buildings of masonry construction that range in size from 2,190 to 2,587 square feet of building area. The buildings range in age from 113 to 118 years old. Each comparable has a full unfinished basement, two-bathrooms, and a 1-car or a 2-car garage. The comparables have the same assessment neighborhood code as the subject and are located within the same block as the subject. The comparables have improvement assessments ranging from \$35,921 to \$45,625 or from \$14.59 to \$19.46 per square foot of building area.

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 Board finds the best evidence of assessment equity to be board of review comparables #1, #2 and #3, which are most similar to the subject in location, masonry construction, style and size. Each of these properties has fewer bathrooms than the subject, an unfinished basement, and a smaller garage than the subject, which suggests upward adjustments to these comparables would be appropriate to make them more equivalent to the subject. These comparables have improvement assessments ranging from \$35,921 to \$45,625 or from \$14.59 to \$17.92 per square foot of building area. The subject's improvement assessment of \$31,579 or \$11.50 per square foot of building area is below the range established by the best comparables in this record, demonstrating the subject is not being inequitably assessed. The Board gives less weight to the remaining comparables submitted by the parties due to differences from the subject property in location, style, size, age, foundation, and/or construction. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's

² The appellant submitted copies of the Cook County Assessor's property characteristic sheets for the comparables from which descriptive information for the properties were verified and/or obtained.

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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