



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

APPELLANT: Miceli C. Williams
DOCKET NO.: 21-57390.001-R-1 through 21-57390.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Miceli C. Williams, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-57390.001-R-1	13-10-401-001-0000	10,668	0	\$10,668
21-57390.002-R-1	13-10-401-002-0000	10,668	22,332	\$33,000
21-57390.003-R-1	13-10-401-003-0000	10,668	0	\$10,668

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 three parcels; the assessment is challenged as to the parcel improved with a 1.5-story multi-family building of frame and masonry exterior construction with 2,107 square feet of gross building area. The building is approximately 100 years old. Features include a full unfinished basement and a two-car garage. The improved parcel on appeal has a 3,810 square foot site located in Chicago, Jefferson Township, Cook County. The subject parcel being challenged is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal concerning the improvement as to parcel 13-10-401-002-0000 (hereinafter -002). In support of this argument, the appellant submitted information on three equity comparables located in the same

neighborhood code and from 1 to 1.3 miles from the subject. The comparables consist of class 2-11 1.5-story or 2-story buildings of frame exterior construction that range in age from 109 to 140 years old. The buildings range in size from 2,152 to 2,348 square feet of gross building area. Features include full basements and comparable #2 has central air conditioning. Each comparable has either a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$18,981 to \$22,000 or from \$8.82 to \$10.11 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment of \$19,581 or \$9.29 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for parcel -002 of \$33,000. The subject parcel has an improvement assessment of \$22,332 or \$10.60 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 in the same neighborhood code as the subject and either in the subarea or within $\frac{1}{4}$ of a mile from the subject. The comparables consist of class 2-11 two-story buildings of masonry or frame and masonry exterior construction that range from 95 to 101 years old. The buildings range in size from 2,098 to 2,184 square feet of gross building area. Each comparable has a full basement, one of which has finished area, and comparable #3 has central air conditioning. Three comparables have either a one-car or a two-car garage. The comparables have improvement assessments ranging from \$24,022 to \$28,332 or from \$11.45 to \$12.97 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 seven equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables which are each a mile or more distant from the subject property and more importantly are less similar to the subject property in age. In addition, the Board has given reduced weight to appellant's comparable #2 and board of review comparable #3 due to their central air conditioning amenity, which is not a feature of the subject.

The Board finds the best comparables on the record to be board of review comparables #1, #2 and #4, which are each relatively similar to the subject building in age, size, foundation type and some features. Adjustments are necessary for some differences such as finished basement area and/or car capacity. The comparables have improvement assessments ranging from \$24,022 to \$28,332 or from \$11.45 to \$12.97 per square foot of gross building area. The subject's

improvement assessment of \$22,332 or \$10.60 per square foot of gross building area falls below the range established by the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of gross building area basis.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

Based on this record and after considering appropriate adjustments to the best comparables in the record 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Miceli C. Williams, by attorney:
Brian P. Liston
Law Offices of Liston & Tsantilis, P.C.
200 S. Wacker Drive
Suite 820
Chicago, IL 60606

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602