

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jane Clement
DOCKET NO.: 22-21853.001-R-1
PARCEL NO.: 01-19-103-010-0000

The parties of record before the Property Tax Appeal Board are Jane Clement, 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:** \$22,477 **IMPR.:** \$58,523 **TOTAL:** \$81,000

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 2022 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 1-story dwelling of frame exterior construction with 4,695 square feet of living area and is approximately 64 years old. Features include a full basement with finished area, three full bathrooms, one half bathroom, central air conditioning, one fireplace, and a 2.5-car garage. The property has a 224,770 square foot site and is located in Barrington Hills, Barrington Township, Cook County. The subject is classified as a class 2-04 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 with the same assessment neighborhood code as the subject property. Evidence also included property characteristics printouts from the Cook County Assessor's Office which were analyzed to verify/update data in the Section V grid analysis. The comparables are

improved with 1-story or 1.5-story, class 2-04 dwellings of frame, masonry, or masonry exterior construction ranging in size from 4,464 to 5,060 square feet of living area. The homes range in age from 43 to 59 years old. Each comparable has a full basement with one of these having finished area, from two to four full bathrooms with four of these also having a half bathroom, either two or three fireplaces, and from a 2-car to a 3.5-car garage. Four comparables each have central air conditioning. The comparables have improvement assessments ranging from \$24,586 to \$56,610 or from \$5.30 to \$11.62 per square foot of living area. Based on this evidence, the appellant requested that the improvement assessment be reduced to \$44,602 or \$9.50 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$81,000. The subject property has an improvement assessment of \$58,523 or \$12.46 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables with the same assessment neighborhood code as the subject. The comparables are improved with 1-story or 1.5-story, class 2-04 dwellings of frame, masonry, or frame and masonry exterior construction ranging in size from 4,371 to 4,467 square feet of living area. The homes range in age from 42 to 65 years old. Three comparables each have a full or partial basement with one of these having finished area and one comparable has a crawl space foundation. Each comparable has three full bathrooms with three of these having a half bathroom, either one or two fireplaces, and from a 2-car to a 4-car garage. Three comparables each have central air conditioning. The comparables have improvement assessments ranging from \$59,220 to \$63,253 or from \$13.53 to \$14.16 per square foot of living area. Based on this evidence, the board of review requested that 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 suggested equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2, #3, and #4 as well as the board of review comparables #1, #2, and #4 which are less similar to the subject in age than the other comparables in this record or lacks a basement foundation, which the subject features..

The Board finds the best evidence of assessment equity to be the appellant's comparable #5 as well as board of review comparable #3 which are more similar to the subject in location, design/class, age, and dwelling size with varying degrees of similarity in other features. These comparables have improvement assessments of \$56,610 and \$60,529 or \$11.62 and \$13.85 per square foot of living area, respectively. The subject's improvement assessment of \$58,523 or \$12.46 per square foot of living area is bracketed by the two best comparables in this record.

After considering appropriate adjustments to the two best comparables for differences from the subject, the Board finds the subject's improvement is supported and a reduction 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.

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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:	June 17, 2025
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	Clerk of the Property Tax Appeal Board

Section 16-185 of the Property Tax Code provides in part:

**IMPORTANT NOTICE** 

"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 <u>PETITION AND EVIDENCE</u> 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**

Jane Clement, by attorney: Dora Cornelio Schmidt Salzman & Moran, Ltd. 111 W. Washington St. Suite 1300 Chicago, IL 60602

# **COUNTY**

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