



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

APPELLANT: Richard Bullock
DOCKET NO.: 22-24443.001-R-1
PARCEL NO.: 05-34-309-017-0000

The parties of record before the Property Tax Appeal Board are Richard Bullock, 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 **A Reduction** 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: \$17,250
IMPR.: \$47,894
TOTAL: \$65,144

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 is improved with a 1.5-story dwelling of frame exterior construction containing 2,488 square feet of living area. The dwelling is approximately 87 years old. Features of the property include a full basement with a recreation room, central air conditioning, one fireplace, two bathrooms, and a 2-car garage.¹ The property has a 7,500 square foot site located in Evanston, Evanston Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The appellant described the subject as having a basement with a recreation room whereas the board of review described the subject as having an unfinished basement. For purposes of this appeal the Board accepts the appellant's description of the basement's finish. The board of review also described the subject as having other improvements but provided no further descriptive information about these improvements.

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 consisting of class 2-04 properties improved with 1-story or 1.5-story dwellings of masonry, stucco or frame and masonry exterior construction that range in size from 2,295 to 2,587 square feet of living area. The dwellings range in age from 66 to 109 years old. Four comparables have a full basement with two having finished area and one comparable has a slab foundation. Each property has one fireplace, 2½ or 3 bathrooms, and 1.5-car, 2-car or 2.5-car garage. Two comparables have central air conditioning. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$39,080 to \$47,750 or from \$16.50 to \$18.61 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$45,928.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$75,000. The subject property has an improvement assessment of \$57,750 or \$23.21 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 composed of class 2-04 properties improved with 1-story, 1.5-story or 2-story dwellings of frame, masonry or frame and masonry exterior construction that range in size from 1,922 to 2,200 square feet of living area. The homes range in age from 70 to 114 years old. Each comparable has a full basement with two having finished area, one fireplace, 1½ to 2½ bathrooms, and a 1-car or a 2-car garage. Three comparables have central air conditioning. These properties have the same assessment neighborhood code as the subject and are located in "subarea" or ¼ of a mile from the subject. Their improvement assessments range from \$50,750 to \$61,062 or from \$24.90 to \$27.76 per square foot of living 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted information on nine equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparables #1, #3 and #4 due to differences from the subject in style and/or foundation. The Board gives less weight to the board of review comparables due to differences from the subject in dwelling size being from approximately 12% to 23% smaller than the subject home and/or differences from the subject in style. The Board finds the best evidence of assessment equity to be appellant's comparables #2 and #5 that are improved with 1.5-story dwellings of masonry or stucco exterior construction with 2,495 and 2,525 square feet of living area, respectively. The properties have varying degrees of similarity to the subject in features requiring adjustments to make them more equivalent to the subject property. Both comparables have an additional ½ bathroom relative to the subject suggesting each would require a downward

adjustment for this difference. Appellant's comparable #2 has an unfinished basement unlike the subject's finished basement and a smaller garage than the subject indicating the comparable would require upward adjustments to make the property more equivalent to the subject for these differences. Appellant's comparable #5 does not have central air conditioning, a feature of the subject property, necessitating an upward adjustment to make this property more equivalent to the subject for this difference. These two comparables have improvement assessments of \$44,137 and \$47,000 or \$17.69 and \$18.61 per square foot of living area, respectively. The subject's improvement assessment of \$57,750 or \$23.21 per square foot of living area falls above the two best comparables in this record. Based on this record; after considering the appropriate adjustments to the best comparables, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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: _____

June 17, 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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