



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

APPELLANT: Alex Origiano
DOCKET NO.: 22-25406.001-R-1
PARCEL NO.: 05-34-422-011-0000

The parties of record before the Property Tax Appeal Board are Alex Origiano, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook, 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: \$12,075
IMPR.: \$43,925
TOTAL: \$56,000

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 two-story multi-family building of frame exterior construction with 2,701 square feet of gross building area and which is approximately 134 years old. Features include a full basement, 2½ bathrooms, and central air conditioning. The property has a 5,250 square foot site and is located in Evanston, Evanston Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in the same neighborhood code as the subject and from .1 to 1.5 miles from the subject. The comparables consist of class 2-11 two-story buildings of frame or frame and masonry exterior construction that are 65 to 129 years old. The buildings range in size from

2,560 to 3,815 square feet of gross building area. Features include 2 or 3 bathrooms, with comparable #1 having 3 half-baths. Each building has a full basement, central air conditioning, and comparable #2 has a 1.5-car garage. The comparables have improvement assessments ranging from \$29,000 to \$54,740 or from \$9.76 to \$14.35 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment of \$33,357 or \$12.35 per square foot of gross building area which represents the average of the comparables.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$56,000. The subject property has an improvement assessment of \$43,925 or \$16.26 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 and either the subarea or ¼ of a mile from the subject. The comparables consist of class 2-11 two-story buildings of masonry exterior construction which are 66 to 104 years old. The buildings range in size from 2,255 to 2,800 square feet of gross building area. Each comparable has a full basement, 2 bathrooms, comparable #3 has central air conditioning, and comparable #2 has two fireplaces. Each comparable has a two-car garage. The comparables have improvement assessments ranging from \$37,388 to \$48,130 or from \$16.32 to \$17.19 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 eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #1, #3 and #4 as well as board of review comparable #4, each of which differ significantly in building size from approximately 16% to 41% when compared to the subject. The Board has given reduced weight to board of review comparable #3, due to its superior age of 66 years when compared to the subject that is more than twice as old.

The Board finds the best evidence of assessment equity are appellant's comparable #2 along with board of review comparables #1 and #2, which are each relatively similar to the subject in location, classification, and some features. These comparables differ somewhat in building size when compared to the subject suggesting adjustments are necessary for size differences. In addition, the subject has an additional half-bath that is not present in any of the best comparables suggesting upward adjustments to the comparables would be necessary. The best board of review comparables each lack air conditioning, a feature of the subject, suggesting additional

upward adjustments to these two properties would be appropriate in order to make them more similar to the subject. Finally, each of the three best comparables have garages which is not a feature of the subject indicating downward adjustments would be necessary to make the properties more similar to the subject. The best comparables in the record have improvement assessments ranging from \$29,000 to \$48,130 or from \$11.33 to \$17.19 per square foot of gross building area. The subject's improvement assessment of \$43,925 or \$16.26 per square foot of gross building area is within the range of 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: 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

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