

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Enzo Venuti
DOCKET NO.: 22-33033.001-R-1
PARCEL NO.: 12-11-303-049-0000

The parties of record before the Property Tax Appeal Board are Enzo Venuti, the appellant, by attorney Kyle Gordon Kamego, 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 <u>A Reduction</u> 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: \$6,500 **IMPR.:** \$16,762 **TOTAL:** \$23,262

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 one-story dwelling of masonry exterior construction with 864 square feet of living area, and which is approximately 64 years old. Features include a crawl-space foundation, 1 full bathroom, and a two-car garage. The property has a 5,000 square foot site and is located in Norridge, Leyden Township, Cook County. The subject is classified as a class 2-02 property under the Cook County Real Property Assessment Classification Ordinance.¹

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, where comparable #4 is located in the same neighborhood code as the subject. The remaining three comparables are located from 4.5 to 5-miles from the subject. The comparables consist of class 2-02 1-story or 1.5-story dwellings of masonry or frame and masonry exterior

¹ One-story Residence, any age, up to 999 square feet.

construction which are 65 to 70 years old. The dwellings range in size from 867 to 965 square feet of living area. Comparable #4 has a full basement and the remaining comparables have crawl foundations. Each comparable has 1 or 2 full bathrooms and a two-car garage. The comparables have improvement assessments ranging from \$15,792 to \$18,353 or from \$18.17 to \$19.36 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$16,347 or \$18.92 per square foot of living area representing the average of the comparables presented.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$27,063. The subject property has an improvement assessment of \$20,563 or \$23.80 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables are located in the same neighborhood code as the subject and the same block or \(\frac{1}{4} \) of a mile from the subject. The comparables consist of either class 2-02 or class 2-03² 1-story or 1.5-story dwellings of frame or masonry exterior construction which are 61 to 64 years old. The dwellings range in size from 720 to 1,008 square feet of living area. The comparables have full basements, two of which have finished area. Two homes have central air conditioning, and the homes have either 1 or 1½ bathrooms. Each comparable has a two-car garage. The comparables have improvement assessments of \$17,525 or \$26,500 or from \$24.34 to \$26.96 per square foot of living 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of seven suggested equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #4 as well as the board of review comparables, due to differences in foundation type of full basements when compared to the subject crawl-space foundation and other comparables in the record.

The Board finds the best evidence of assessment equity in the record consists of the appellant's comparables #1, #2 and #3, which present various degrees of similarity to the subject in design, exterior construction, age, dwelling size, foundation and features. These best comparables necessitate adjustments to account for slight differences in age and dwelling size when compared to the subject. The best comparables have improvement assessments ranging from \$15,792 to

² One-story Residence, any age, 1,000 to 1,800 square feet

\$16,815 or from \$18.17 to \$19.36 per square foot of living area. The subject's improvement assessment of \$20,563 or \$23.80 per square foot of living area is above the range of the best comparables both in terms of overall improvement assessment and on a per-square-foot of living area basis.

Based on this record and after considering appropriate adjustments to the comparables to make them more similar to the subject, the Board finds the appellant established 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.

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	Chairman
C R	Robert Stoffen
Member	Member
Dan De Kinin	Sarah Bobber
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.

August 19, 2025
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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 <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

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APPELLANT

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COUNTY

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