

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: George Raiman

DOCKET NO.: 22-34591.001-R-1

PARCEL NO.: 13-16-115-047-0000

The parties of record before the Property Tax Appeal Board are George Raiman, 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 <u>no change</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:** \$27,210 **IMPR.:** \$62,825 **TOTAL:** \$90,035

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 two improvements.<sup>1</sup> Improvement #1 is a 2-story apartment building of masonry exterior construction with 5,276 square feet of building area. The building is approximately 96 years old. Features of the building include a full basement finished with an apartment, five full bathrooms, and a 4-car garage. The property has an approximately 9,718 square foot site and is located in Chicago, Jefferson 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 with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables that are located in the same assessment neighborhood code as the subject property. The comparables are improved with class 2-11, 2-story or 3-story buildings of masonry exterior

<sup>&</sup>lt;sup>1</sup> Neither party gave any descriptive information on Improvement #2.

construction that range in size from 4,630 to 5,594 square feet of building area. The buildings range in age from 71 to 111 years old. Each building has a full basement, two finished with an apartment. The buildings have from three to six full bathrooms. Two comparables each have a 3-car garage. The comparables have improvement assessments that range from \$35,663 to \$46,934 or from \$6.98 to \$9.11 per square foot of building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$43,685 or \$8.28 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$90,035. The subject property has a total improvement assessment of \$62,825 or \$11.91 per square foot of total building area.

In response to the appeal, the board of review stated that the property has multiple improvements which was not refuted by the appellant, and the appeal is for only Improvement #1 which has an assessment is \$43,371 or \$8.41 per square foot of 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 assessment neighborhood code as the subject property. The comparables are improved with class 2-11, 2-story buildings of masonry exterior construction that range in size from 4,790 to 5,124 square feet of building area. The dwellings range in age from 92 to 98 years old. Each building has a full basement, one finished with an apartment. The comparables each have either four or six full bathrooms. One comparable has two fireplaces and one comparable has a 3-car garage. The comparables have improvement assessments ranging from \$41,757 to \$48,783 or from \$8.52 to \$9.52 per square foot of 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 record contains eight suggested equity comparables for the Board's consideration. The Board has given less weight to appellant's comparables #2, #3 and #4 due to their dissimilar ages and/or story height. The Board has given reduced weight to appellant's comparable #1 which appears to be an outlier when compared to other comparables in the record.

The Board finds the best evidence of assessment equity to be the board of review comparables. The Board finds that these comparables are most similar to the subject in design, age, building size and some features. However, each of these comparables lack a second improvement, suggesting adjustments would be required to make these comparables more equivalent to the subject. Nevertheless, these most similar comparables have improvement assessments ranging from \$41,757 to \$48,783 or from \$8.52 to \$9.52 per square foot of building area. The subject's total

improvement assessment of \$62,825 or \$11.91 per square foot of building area, falls above the range of the best comparables in this record, which is logical given the property has multiple improvements. However, Improvement #1 assessment falls within the range. Based on this record and after considering adjustments to the best comparables for differences from 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 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
a R	Robert Stoffen
Member	Member
Dan Dikini	
Member	Member
DISSENTING:	
<u>C E R '</u>	<u>TIFICATION</u>

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:	July 15, 2025
	14:1016
	Mallon

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**

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

## **APPELLANT**

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## **COUNTY**

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