



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

APPELLANT: Jerry Stanfield
DOCKET NO.: 22-37653.001-R-1
PARCEL NO.: 13-04-109-015-0000

The parties of record before the Property Tax Appeal Board are Jerry Stanfield, 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 **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: \$19,687
IMPR.: \$36,692
TOTAL: \$56,379

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 dwelling of masonry exterior construction with 2,312 square feet of living area. The dwelling was constructed in 1938 and is approximately 83 years old. Features of the home include a concrete slab foundation, 2 bathrooms, and a one-car garage. The property has a 7,875 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-06 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 within .4 of a mile from the subject. The comparables consist of class 2-06 two-story dwellings of masonry exterior construction that range in age from 74 to 82 years old. The homes range in size from 2,254 to

2,430 square feet of living area. Each comparable has a full basement, 1½ or 2 bathrooms, central air conditioning, and from one-car to a two-car garage. Three comparables have one or two fireplaces. The comparables have improvement assessments ranging from \$35,375 to \$39,938 or from \$15.44 to \$16.54 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$36,691 or \$15.87 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal." The appellant supplied a copy of the final decision disclosing the total assessment for the subject of \$59,999.¹ The subject property has an improvement assessment of \$40,312 or \$17.44 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 located in the same neighborhood code and either in the same tax block or within ¼ of a mile from the subject. The comparables consist of class 2-06 two-story dwellings of masonry exterior construction that range in age from 70 to 83 years old. The homes range in size from 2,215 to 2,609 square feet of living area. Each comparable has a full or partial basement, three of which have finished area. Features include 2 or 3 full bathrooms and two comparables each have a half-bath. Three dwellings have central air conditioning and each comparable has a fireplace and from a 1.5-car to a 2.5-car garage. The comparables have improvement assessments ranging from \$39,693 to \$49,370 or from \$17.92 to \$20.15 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 eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparables #2, #3 and #4, each of which have finished basement area which is not a feature of the subject and comparable #3 at 70 years old differs from the subject in age. In light of other more similar comparables being available in the record, the Board has also given reduced weight to appellant's comparables #2 and #4, each with an age of 74 years old as compared to the subject's age of 83 years old.

¹ Given the tax year 2022 final decision, the Board has not accepted the board of review assertion that the subject's total assessment was \$60,001.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 and #3 along with board of review comparable #1, which are relatively similar to the subject in location, age, design, exterior construction, and dwelling size. Each of these comparables necessitates downward adjustments for basement foundation when compared to the subject slab foundation. Additional adjustments are necessary for differences in bathroom count, fireplace amenity and/or car capacity. These comparables have improvement assessments ranging from \$36,900 to \$39,693 or from \$15.44 to \$17.92 per square foot of living area. The subject's improvement assessment of \$40,312 or \$17.44 per square foot of living area falls slightly above the range established by the best comparables in this record in terms of overall improvement assessment and within the range on a per-square-foot of living area basis, which the Board finds to be excessive given the subject's concrete slab foundation.

Based on this record and after considering appropriate adjustments to the best comparables for differences when compared to the subject property, the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment commensurate with the appellant's request 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: _____

December 17, 2024



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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