

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Maria Plewa DOCKET NO.: 22-46454.001-R-1 PARCEL NO.: 12-12-214-019-0000

The parties of record before the Property Tax Appeal Board are Maria Plewa, the appellant, by attorney Andrew S. Dziuk, of Andrew Dziuk, Esq. 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 *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: \$3,716 **IMPR.:** \$17,284 **TOTAL:** \$21,000

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 2-story townhome of masonry exterior construction with 927 square feet of living area and is approximately 78 years old. Features include a full basement and 1.0 bathroom. The property has an 1,858 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-10 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 five equity comparables with the same assessment neighborhood code as the subject. The comparables are improved with class 2-10 townhomes of masonry exterior construction ranging in size from 915 to 1,049 square feet of living area. The comparables are either 78 or 79 years old. Each comparable has a full or partial basement and 1.0 bathroom. The comparables have improvement assessments of either \$14,284 or \$15,550 or ranging from \$13.62 to \$16.72 per

square foot of living area. Based on this evidence, the appellant requested that the improvement assessment be reduced to \$12,625 or \$13.62 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$21,000. The subject property has an improvement assessment of \$17,284 or \$18.65 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on five grid analyses for twenty equity comparables with the same assessment neighborhood code as the subject. For ease of reference, the comparables on the second through fifth grid were renumbered #5 through #20 in the order in which they were presented. The comparables are improved with class 2-10 townhomes of masonry exterior construction ranging in size from 912 to 930 square feet of living area. The comparables are either 76 or 78 years old. Nineteen comparables each have a full or partial basement and one comparable has a slab foundation. Each comparable has 1.0 or 1.5 bathrooms. Nine comparables each have central air conditioning. Twelve comparables each have from a 1-car to a 2-car garage. The comparables have improvement assessments ranging from \$17,720 to \$22,255 or from \$19.05 to \$24.40 per square foot of living area. Based on this evidence, the board of review requested that the subject's assessment be confirmed.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted twenty-five suggested comparables for the Board's consideration. The Board finds each of the parties' comparables to be relatively similar to the subject in location, class, age, and dwelling size. However, the Board accords diminished weight to the appellant's comparables #1 and #2 which are less similar to the subject in dwelling size than the remaining comparables in this record. The Board also accords diminished weight to board of review comparables #1 through #7, #11, #12, and #15 through #19 due to differences from the subject in garage amenity and/or central air conditioning, both features the subject lacks. Further, board of review #4 lacks a basement foundation, which the subject features. The parties' remaining comparables have improvement assessments ranging from \$14,284 to \$20,499 or from \$15.23 to \$22.31 per square foot of living area. The subject's improvement assessment of \$17,284 or \$18.65 per square foot of living area falls within the range established by the best comparables in this record. After considering appropriate 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 subject's assessment is not justified.

said office.

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	<u> </u>
	Solot Stoffen
Member	Member
Dan Dikini	
Member	Member
DISSENTING:CERTIFICATION	
CERTITIONITY	<u>011</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	

Clerk of the Property Tax Appeal Board

July 15, 2025

IMPORTANT NOTICE

Date:

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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