

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: William Jaramillo

DOCKET NO.: 22-47037.001-R-1 through 22-47037.002-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are William Jaramillo, the appellant, by attorney Brian S. Maher, of Weis, DuBrock, Doody & Maher 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 <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:

| DOCKET NO        | PARCEL NUMBER      | LAND  | IMPRVMT | TOTAL    |
|------------------|--------------------|-------|---------|----------|
| 22-47037.001-R-1 | 15-13-421-011-0000 | 1,796 | 18,481  | \$20,277 |
| 22-47037.002-R-1 | 15-13-421-012-0000 | 1,796 | 18,481  | \$20,277 |

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 multi-family building of masonry exterior construction with 5,280 square feet of building area. The building is approximately 51 years old. Features of the building include a full basement that is finished with an apartment. The property has two parcels containing 6,250 square feet of land area and is located in Forest Park, Proviso 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 comparables with the same assessment neighborhood code as the subject. The comparables are class 2-11 properties improved with 2-story or 3-story multi-family buildings of masonry or frame and masonry exterior construction that range in size from 4,482 to 5,085 square feet of building area.

The buildings are 23 to 56 years old. Three comparables have full basements and one comparable has a slab foundation. Two comparables each have a 2-car or a 3-car garage. The comparables have improvement assessments that range from \$32,575 to \$35,774 or from \$6.85 to \$7.27 per square foot of building area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The appellant submitted the board of review decision for both parcels that disclosed a total assessment of \$57,290. The appellant further disclosed both parcels have a combined improvement assessment of \$53,698.

The board of review submitted its "Board of Review Notes on Appeal" on one parcel. The subject's combined total improvement assessment for both parcels is \$53,698 or \$10.17 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 with the same assessment neighborhood code as the subject property. Comparable #4 is the same property as appellant's comparable #1. The comparables are class 2-11 properties improved with 2-story multi-family buildings of masonry or frame and masonry exterior construction ranging in size from 2,310 to 4,482 square feet of building area. The buildings are 52 to 54 years old and have full basements, two of which are finished with an apartment or a recreation room. Two comparables each have a 2-car or a 3.5-car garage. The comparables have improvement assessments that range from \$28,742 to \$32,575 or from \$7.27 to \$12.44 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains eight suggested equity comparables for the Board's consideration. The Board gives less weight to appellant's comparables #1 and #2 along with the board of review comparables due to differences in age, building size, foundation type and/or garage amenity when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparables #3 and #4 which overall are more similar to the subject in location, age, building size and features. However, both of the appellant's comparables are not reported to have finished basement area, which is a feature of the subject, suggesting upward adjustments are necessary to make them more equivalent to the subject. The comparables have improvement assessments of \$33,179 and \$33,195 or \$6.85 per square foot of building area. The subject's improvement assessment of

\$53,698 or \$10.17 per square foot of building area falls above the range established by the best comparables in the record. After considering adjustments to the best comparables for differences from the subject, the Board finds the appellant 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 warranted.

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 Kinie | Swah 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.

Date: August 19, 2025

Will St. Land Brown Tow Appeal Road

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