



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

APPELLANT: Whitney Cox
DOCKET NO.: 22-48202.001-R-1
PARCEL NO.: 20-11-416-006-0000

The parties of record before the Property Tax Appeal Board are Whitney Cox, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd. 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: \$18,750
IMPR.: \$39,932
TOTAL: \$58,682

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 1.5-story dwelling of frame construction with 1,540 square feet of living area that is approximately 134 years old.¹ The features of the subject property include 2 full baths, a full unfinished basement, and central air conditioning. The property has a 3,750 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-03 property² under the Cook County Real Property Assessment Classification Ordinance.

¹ There is a discrepancy with regard to the parties' description of the subject dwelling with the appellant's grid depicting the subject as a 1-story residence, 134 years old with a finished basement, and the board of review describing the subject as a 1.5-story residence, 133 years old with an unfinished basement. As the appellant's description in section III of the appeal form is inconsistent with the description in the grid analysis, and given that the appellant did not refute the board of review's description of the subject via a rebuttal filing, the Board finds that the best description of the subject is offered by the board of review.

² One-story residence, any age, with 1,000 to 1,800 square feet of living area.

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 located within the same assessment neighborhood code as the subject property. The comparables consist of 1-story, class 2-03 dwellings of frame or masonry construction ranging in size from 1,087 to 1,617 square feet of living area and ranging in age from 60 to 134 years old. Each comparable features one or two full baths and a full basement, three finished with formal recreation rooms. Two comparables have central air conditioning, two comparables each have a fireplace, and two have either a 1-car or a 1.5-car garage. The comparables have improvement assessments that range from \$24,000 to \$37,500 or from \$18.64 to \$24.61 per square foot of living area. The appellant also submitted a brief requesting a reduction to the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$58,682. The subject property has an improvement assessment of \$39,932 or \$25.93 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 within ¼ of a mile from the subject and in the same assessment neighborhood code as the subject property. The comparables consist of 1-story or 1.5-story, class 2-03 dwellings of frame or masonry construction ranging in size from 1,320 to 1,498 square feet of living area and ranging in age from 97 to 128 years old. The comparables each feature either 1½ or 2 baths and a full or partial basement, one finished with a recreation room. Two comparables have central air conditioning, three comparables have one or two fireplaces, and one comparable has a 2.5-car garage. The comparables have improvement assessments ranging from \$39,500 to \$45,500 or from \$26.37 to \$33.71 per square foot of living area.

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 parties submitted a total of nine equity comparables in support of their positions before the Property Tax Appeal Board. The Board gave less weight to appellant's comparables #1, #3, #4, and #5, along with board of review comparables #2 and #3 due to differences from the subject in age, dwelling size, basement finish, and/or a garage feature.

On this record, the Board finds the best evidence of equity in assessment to be appellant's comparable #2 and board of review comparables #1 and #4 which are overall most similar to the subject in location, dwelling size, age, unfinished basements, and features. The three best comparables in this record have improvement assessments ranging from \$33,500 to \$42,500 or from \$20.72 to \$32.20 per square foot of living area. The subject's improvement assessment of

\$39,932 or \$25.93 per square foot of living area falls within the range established by the best equity comparables in this record both in terms of overall improvement assessment, and on a per square foot of living area basis.

On this record, the Board finds that the appellant did not establish by clear and convincing evidence that the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement assessment is not 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.

Chairman

Member

Member

Member

Member

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: July 15, 2025

Clerk of the Property Tax Appeal Board

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

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