



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

APPELLANT: Patrick & McLaurin Files
DOCKET NO.: 22-53061.001-R-1
PARCEL NO.: 14-33-404-003-0000

The parties of record before the Property Tax Appeal Board are Patrick & McLaurin Files, the appellants, 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 **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: \$15,350
IMPR.: \$85,650
TOTAL: \$101,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 three-story dwelling of masonry exterior construction with 2,280 square feet of living area. The dwelling is approximately 134 years old. The home features a full basement that is finished with a formal recreation room,¹ central air conditioning and 2½ bathrooms. The property has a 1,228 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-10 property, an old-style row house or town home, under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellants submitted information on four equity

¹ The board of review disclosed the subject has a formal recreation room in the basement, which was not refuted by the appellants.

comparables that have the same assessment neighborhood code and property classification code as the subject property. The comparables are improved with three-story dwellings of masonry exterior construction ranging in size from 2,178 to 2,781 square feet of living area. The dwellings are from 133 to 144 years old. One comparable has a concrete slab foundation and three comparables each have a full basement. No data was provided by the appellants concerning finished basement area. Each comparable has 1½ or 2½ bathrooms. Two comparables each have one or two fireplaces. The comparables have improvement assessments that range from \$77,000 to \$95,204 or from \$29.09 to \$35.35 per square foot of living area. Based on this evidence, the appellants requested the subject's improvement assessment be reduced to \$79,868 or \$35.03 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 \$101,000. The subject property has an improvement assessment of \$85,650 or \$37.57 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on 20 equity comparables that have the same assessment neighborhood code and property classification code as the subject.² The comparables are located approximately ¼ of a mile from the subject property or within the subject's subarea. The comparables are improved with two-story or three-story dwellings of masonry exterior construction ranging in size from 2,025 to 2,434 square feet of living area. The dwellings are from 130 to 144 years old. The comparables each have a full basement, 15 of which have finished area. Each comparable has either 1½, 2, 2½ or 3 bathrooms, 12 comparables have central air conditioning, 15 comparables each have one or two fireplaces and seven comparables each have a one-car or a two-car garage. The comparables have improvement assessments that range from \$77,900 to \$117,788 or from \$38.47 to \$56.47 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 taxpayers contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted 24 comparable properties for the Board's consideration. The Board has given less weight to the appellants' comparables due to differences from the subject dwelling in size and/or foundation type. The Board has given reduced weight to board of review comparables #1, #3 through 18 and #20 due to their dissimilar two-story designs when compared to the subject's three-story design. Additionally, the appellants' comparables, as well as board of

² The board of review presented five separate equity grids, each containing four comparable properties. For ease of reference, the Board has renumbered the comparables as #1 through #20.

review comparables #5, #6, #10 through #13, #17 and #18 each lack central air conditioning, a feature of the subject and board of review comparables #3 through #9 each have a garage, unlike the subject.

The Board finds the best evidence of assessment equity to be board of review comparables #2 and #9, which overall are most similar to the subject in location, dwelling size, design, age and some features. However, the Board finds these two comparables have varying degrees of similarity when compared to the subject in fireplace count and basement finish, suggesting adjustments for these differences would be necessary. Nevertheless, the comparables have improvement assessments of \$94,675 and \$77,900 or \$41.31 and \$38.47 per square foot of living area, respectively. The subject's improvement assessment of \$85,650 or \$37.57 per square foot of living area is bracketed by the two best comparables in the record in terms of total improvement assessment but less than these comparables on a per square foot basis. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellants 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.

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: _____

April 15, 2025



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

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

APPELLANT

Patrick & McLaurin Files, by attorney:
Brian S. Maher
Weis, DuBrock, Doody & Maher
1 North LaSalle Street
Suite 1500
Chicago, IL 60602

COUNTY

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