

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: James Stricker
DOCKET NO.: 23-21197.001-R-1
PARCEL NO.: 01-01-401-017-0000

The parties of record before the Property Tax Appeal Board are James Stricker, the appellant, by attorney Brian P. Liston of the Law Offices of Liston & Tsantilis, P.C. 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>no change</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:

**LAND:** \$6,250 **IMPR.:** \$63,990 **TOTAL:** \$70,240

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 2023 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 frame exterior construction with 3,094 square feet of living area. The dwelling is approximately 13 years old. The home features a full basement that is finished with a formal recreation room, four full bathrooms, central air conditioning, two fireplaces and a 2-car garage. The property has a 6,250 square foot site and is located in Barrington, Barrington Township, Cook County. The subject is classified as a class 2-78 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 three equity comparables that are located from .3 of a mile to 1 mile from the subject property, two of which

<sup>&</sup>lt;sup>1</sup> The board of review disclosed the subject basement is finished with a formal recreation room, which was not refuted by the appellant.

have the same assessment neighborhood code as the subject. The comparables each have the same property classification code as the subject and are improved with two-story dwellings of frame exterior construction ranging in size from 2,984 to 3,022 square feet of living area. Two dwellings are either 8 or 17 years old and comparable #2 is reported to be "0" years old. The comparables each have a full basement. No data was provided by the appellant concerning basement finish, if any, for the comparables. Each comparable has two or three full bathrooms, an additional one or two half bathrooms, central air conditioning and either a 2.5-car or a 3-car garage. Two comparables each have a fireplace. The comparables have improvement assessments that range from \$47,631 to \$55,000 or from \$15.80 to \$18.43 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$51,422 or \$16.62 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 \$70,240. The subject property has an improvement assessment of \$63,990 or \$20.68 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located either within the same block as the subject or within the subject's subarea. The comparables are improved with two-story dwellings of frame exterior construction ranging in size from 2,393 to 3,624 square feet of living area. The dwellings are from 1 to 16 years old. The comparables each have a full basement that is finished with a formal recreation room, from two to four full bathrooms, an additional half bathroom, central air conditioning, one or two fireplaces and either a 2-car, a 2.5-car or a 3-car garage. The comparables have improvement assessments that range from \$61,329 to \$112,250 or from \$22.52 to \$31.13 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted seven comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparable #1 due to its different assessment neighborhood code and distant location from the subject being approximately one mile away. The Board has also given less weight to the appellant's comparable #2, as well as board of review comparables #1, #3 and #4 due to differences from the subject dwelling in age and/or size.

The Board finds the best evidence of assessment equity to be the appellant's comparable #3 and board of review comparable #2, which are similar to the subject in location and overall, most

similar to the subject dwelling in size, design and age. However, both comparables have varying degrees of similarity when compared to the subject dwelling in features, such as bathroom count, fireplace count, basement finish and garage capacity, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables have improvement assessments of \$55,000 and \$75,802 or \$18.43 and \$22.52 per square foot of living area, respectively. The subject's improvement assessment of \$63,990 or \$20.68 per square foot of living area is bracketed by the two best comparables in the record. Based on this record and after considering 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.

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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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
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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**

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