



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

APPELLANT: International Banc, Inc.
DOCKET NO.: 23-32349.001-R-1
PARCEL NO.: 14-19-314-042-0000

The parties of record before the Property Tax Appeal Board are International Banc, Inc., the appellant, by Robert Rosenfeld, attorney-at-law of Robert H. Rosenfeld & Associates, LLC in Northbrook, 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: \$37,500
IMPR.: \$30,500
TOTAL: \$68,000

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 two-story building of frame exterior construction with 3,276 square feet of building area. The building is approximately 145 years old. Features of the property partial unfinished basement, 3½ bathrooms and a 2-car garage. The property has a 3,000 square foot site located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-12 mixed-use commercial/residential building under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables consisting of class 2-12 properties improved with two-story buildings of frame or masonry exterior construction that range in size from 2,688 to 3,585 square feet of building area. The buildings range in age from 97 to 129 years old. Each property has a partial basement and

two comparables have either a 1½-car or a 2-car garage. These properties have two to four full bathrooms and three comparables have an additional ½ bathroom. These properties have the same assessment neighborhood code as the subject property and are located from approximately .07 to .9 of a mile from the subject property. Comparables #1 and #3 are located along the same street as the subject property. The comparables have improvement assessments ranging from \$24,100 to \$30,500 or from \$8.51 to \$8.97 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$28,698.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$68,000. The subject property has an improvement assessment of \$30,500 or \$9.31 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 consisting of class 2-12 properties improved with two-story buildings of frame or masonry exterior construction that range in size from 2,518 to 3,900 square feet of building area. The buildings range in age from 104 to 133 years old. Each property has a full or partial basement with one having a formal recreation room. The comparables have two, three or five full bathrooms and two comparables have an additional one or two ½ bathrooms. One comparable has central air conditioning and one comparable has a three-car garage. These properties have the same assessment neighborhood code as the subject property and are located approximately ¼ of a mile from the subject. Comparable #3 is located along the same street as the subject property. Their improvement assessments range from \$32,937 to \$36,777 or from \$9.43 to \$13.08 per square foot of building area.

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 record contains information on eight suggested comparables submitted by the parties to support their respective positions. The Board gives less weight to appellant's comparables #2 and #4 as well as board of review comparables #1, #2 and #3 due to differences from the subject building in size. The Board gives most weight to appellant's comparables #1 and #3 as well as board of review comparable #3 that range in size from 2,992 to 3,585 square feet building area and in age from 104 to 129 years old. Each comparable is located along the same street as the subject and within approximately .3 of a mile from the subject property. These comparables have improvement assessments that range from \$26,719 to \$34,500 or from \$8.51 to \$10.69 per square foot of building area. The subject's improvement assessment of \$30,500 or \$9.31 per square foot of building area falls within the range established by the best comparables in this record. Based on this record 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.



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: _____

February 18, 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

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