



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

APPELLANT: Sean Ridgeway
DOCKET NO.: 23-38794.001-R-1
PARCEL NO.: 12-12-218-001-0000

The parties of record before the Property Tax Appeal Board are Sean Ridgeway, the appellant, by attorney Robert Rosenfeld 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 **a reduction** 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: \$9,866
IMPR.: \$21,912
TOTAL: \$31,778

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 masonry exterior construction with 1,528 square feet of living area. The dwelling is approximately 81 years old. Features of the home include a partial unfinished basement, central air conditioning, 1½ bathrooms, a fireplace and a 1-car garage. The property has an approximately 4,933 square foot site and is located in Chicago, Jefferson Township, Cook County. The subject is classified as a class 2-05 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 equity comparables that have the same assessment neighborhood code as the subject. The comparables are class 2-05 properties that are improved with two-story dwellings of masonry exterior construction ranging in size from 1,348 to 1,696 square feet of living area. The dwellings are

from 77 to 82 years old. The comparables each have a full or partial basement. However, the appellant did not address whether there was basement finish and only reported "n/a" in the finished basement area section of the grid analysis. Each comparable has central air conditioning, 1½ bathrooms and either a 1-car or a 2-car garage. Comparable #4 has a fireplace. The comparables have improvement assessments that range from \$16,190 to \$24,999 or from \$12.01 to \$14.74 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$20,903 or \$13.68 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 \$34,000. The subject property has an improvement assessment of \$24,134 or \$15.79 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 that have the same assessment neighborhood code as the subject. The comparables are class 2-05 properties that are improved with two-story dwellings of masonry exterior construction ranging in size from 1,248 to 1,404 square feet of living area. The dwellings are from 71 to 79 years old. The comparables each comparable have a full basement, two of which have finished area. Each comparable has either 1 or 1½ bathrooms. Comparable #2 has central air conditioning, comparable #1 has two fireplaces and each comparable has a 2-car garage. The comparables have improvement assessments that range from \$20,840 to \$24,840 or from \$16.62 to \$17.69 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted eight comparable properties for the Board's consideration. The Board has given less weight to the comparables submitted by the board of review, which are less similar to the subject dwelling in size and/or they lack central air conditioning, a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables, which are similar to the subject in location, dwelling size, design, age and some features. However, the Board finds three comparables lack a fireplace, a feature of the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Conversely, three comparables have larger garage sizes when compared to the subject, suggesting downward adjustments would be necessary for this difference. Nevertheless, these four comparables have improvement assessments ranging from \$16,190 to \$24,999 or from \$12.01 to \$14.74 per square foot of living area. The subject's improvement assessment of

\$24,134 or \$15.79 per square foot of living area falls at the upper end of the range established by the best comparables in the record in terms of total improvement assessment and above the comparables on a per square foot basis. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is excessive. Based on this record, the Board finds a reduction in the subject's improvement assessment 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.



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: _____

December 17, 2024



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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