



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

APPELLANT: David Shrader
DOCKET NO.: 23-39219.001-R-1
PARCEL NO.: 10-33-309-016-0000

The parties of record before the Property Tax Appeal Board are David Shrader, 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 **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: \$13,950
IMPR.: \$45,917
TOTAL: \$59,867

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 1,944 square feet of living area. The dwelling is approximately 84 years old. Features of the home include a full unfinished basement, 1½ bathrooms, central air conditioning, a fireplace, and a one-car garage. The property has a 6,200 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 concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located in the same neighborhood code and within .2 of a mile from the subject. The comparables consist of class 2-05 “two story or more” dwellings of masonry or frame and masonry exterior construction that range in age from 73 to 80 years old. The homes range in size

from 1,717 to 2,151 square feet of living area. Each comparable has a full or partial basement, 1 or 2 full bathrooms and two comparables each have 1 half-bath. Features include central air conditioning and either a one-car or a two-car garage. Two comparables each have a fireplace. The comparables have improvement assessments ranging from \$37,963 to \$44,725 or from \$20.79 to \$22.57 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$42,515 or \$21.87 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 \$59,867. The subject property has an improvement assessment of \$45,917 or \$23.62 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 in the same neighborhood code as the subject and either in the same tax block or within ¼ of a mile from the subject. The comparables consist of class 2-05 two-story dwellings of masonry exterior construction that range in age from 73 to 85 years old. The homes range in size from 1,731 to 2,011 square feet of living area. Three comparables have full unfinished basements and comparable #2 has a concrete slab foundation. Features include from 1 or 2 bathrooms and 1 or 2 half-baths, comparables #1 and #4 each have central air conditioning and each comparable has from a one-car to a two-car garage. Three homes each have one or two fireplaces. The comparables have improvement assessments ranging from \$47,050 to \$52,300 or from \$24.69 to \$28.25 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 a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #1 and #3, due to significantly different dwelling sizes when compared to the subject dwelling. The Board has given reduced weight to board of review comparable #2 which has a concrete slab foundation, which differs from the subject's full basement feature.

The Board finds the best evidence of assessment equity to be appellant's comparables #2 and #4 as well as board of review comparables #1, #3 and #4, which are most similar to the subject in location, design, exterior construction, dwelling size and/or some features. Adjustments to the comparables are necessary for differences in age, air conditioning amenity, bathroom count

and/or garage capacity. These five comparables have improvement assessments ranging from \$39,836 to \$52,300 or from \$21.99 to \$28.25 per square foot of living area. The subject's improvement assessment of \$45,917 or \$23.62 per square foot of living area falls within the range established by the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of living area basis. Based on this record and after considering appropriate adjustments to the best comparables for differences when compared to the subject property, 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: 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

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

APPELLANT

David Shrader, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld & Associates, LLC
40 Skokie Blvd
Suite 150
Northbrook, IL 60062

COUNTY

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