



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

APPELLANT: Brian Passmore
DOCKET NO.: 23-42834.001-R-1
PARCEL NO.: 20-35-226-025-0000

The parties of record before the Property Tax Appeal Board are Brian Passmore, 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 **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: \$4,687
IMPR.: \$8,400
TOTAL: \$13,087

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 1.5-story dwelling of frame and masonry exterior construction with 1,750 square feet of living area. The dwelling is approximately 98 years old. The property features a full basement and 1 bathroom. The property has a 3,750 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-03 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 have the same assessment neighborhood code as the subject and are located

from .4 of a mile to 1.9 miles from the subject property.¹ The comparables are class 2-03 properties improved with 1.5-story dwellings of masonry or frame and masonry exterior construction ranging in size from 1,456 to 1,560 square feet of living area. The dwellings range in age from 87 to 121 years old. Each comparable has a full basement, 1 or 1½ bathrooms and either a 1-car or a 2-car garage. The comparables have improvement assessments that range from \$4,793 to \$5,000 or from \$3.15 to \$3.37 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$5,618 or \$3.21 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 \$13,087. The subject property has an improvement assessment of \$8,400 or \$4.80 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 and are located approximately ¼ of a mile from the subject property or within the subject's subarea.² The comparables are class 2-03 properties improved with 1.5-story dwellings of frame and masonry exterior construction ranging in size from 1,407 to 1,474 square feet of living area. The dwellings range from 92 to 99 years old. The comparables each have a full basement and either 1, 1½ or 2 bathrooms. Comparable #1 has central air conditioning and each comparable has a 1.5-car, a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$8,093 to \$14,425 or from \$5.49 to \$10.17 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 nine comparable properties for the Board's consideration. The Board finds none of the comparables are truly similar to the subject due to significant differences in dwelling size, age, features and/or location. Nevertheless, the Board has given less weight to the appellant's comparables #1 and #3 due to their significantly older dwelling ages and their location is more than a mile from the subject, less proximate than other comparables in the record.

¹ The appellant's comparables #1 and #3 have Property Index Numbers (PINs) that begin with 20-36 and 20-24, indicating these properties are located in section 36 and section 24 of the township, where as the subject's PIN begins with 20-35, indicating the subject is located in section 35 of the township.

² The board of review comparables each have a PIN that begins with 20-35, like the subject, indicating all four properties are located in the same section as the subject property.

The Board finds the appellant's comparable #1, along with the four comparables submitted by the board of review are more similar to the subject in location, design and age. However, all five dwellings are from 11% to 20% smaller than the subject; one dwelling has central air conditioning, unlike the subject; and each comparable has a garage, not a feature of the subject. Additionally, the dwellings have varying degrees of similarity when compared to the subject in bathroom count. These differences suggest adjustments would be required to make the comparables more equivalent to the subject. The comparables have improvement assessments ranging from \$5,000 to \$14,425 or from \$3.21 to \$10.17 per square foot of living area. The subject's improvement assessment of \$8,400 or \$4.80 per square foot of living area falls within the range established by the best comparables in the record both in terms of total improvement assessment and on a per square foot of living area basis. 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.

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: June 16, 2026



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

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