



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

APPELLANT: Timothy Barrett
DOCKET NO.: 23-44450.001-R-1
PARCEL NO.: 14-33-420-021-0000

The parties of record before the Property Tax Appeal Board are Timothy Barrett, the appellant, by attorney Brian S. Maher of Weis, DuBrock, Doody & Maher 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: \$25,000
IMPR.: \$48,000
TOTAL: \$73,000

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 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 multi-family building of frame exterior construction with 2,129 square feet of gross building area.¹ The building is approximately 151 years old. Features of the building include a full basement that is finished with an apartment and two full bathrooms. The property has a 2,000 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-11 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

¹ The parties differ as to the story height of the subject building. The appellant described the subject as a two-story building, which is supported by the photograph evidence provided by the board of review. Additionally, the board of review reported the subject has a basement apartment, which was not refuted by the appellant.

comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are improved with two-story multi-family buildings of frame exterior construction ranging in size from 2,272 to 2,498 square feet of gross building area. The buildings are from 144 to 156 years old. The comparables each have a full basement. No data was provided by the appellant concerning finished basement area. Each comparable has two or four full bathrooms and one comparable has central air conditioning. The comparables have improvement assessments that range from \$42,829 to \$50,535 or from \$17.39 to \$20.57 per square foot of gross building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$39,952 or \$18.77 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$73,000. The subject property has an improvement assessment of \$48,000 or \$22.55 per square foot of gross building 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 and property classification code as the subject. The comparables are located within the subject's subarea. The comparables are improved with two-story multi-family buildings of masonry or frame or masonry exterior construction ranging in size from 1,440 to 1,944 square feet of gross building area. The buildings are from 116 to 147 years old. One comparable has a concrete slab foundation and three comparables each have full basement, two of which are finished with a recreation room. Each comparable has two full bathrooms. Comparable #3 has central air conditioning. Comparable #4 has an additional half bathroom and a fireplace. The comparables have improvement assessments that range from \$42,151 to \$46,400 or from \$23.66 to \$30.97 per square foot of gross building 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 comparables #1 and #3, as well as board of review comparables #1, #3 and #4, which differ from the subject building in size and/or have a concrete slab foundation in contrast to the subject's basement foundation that is finished with an apartment.

The Board finds the best evidence of assessment equity to be the appellant's comparable #2 and board of review comparable #2, which overall are more similar to the subject in location, building size, classification, age and some features. However, the Board finds neither building is

reported to have a basement apartment, like the subject, suggesting upward adjustments for this difference would be required to make the comparables more equivalent to the subject. Conversely, the appellant's comparable #2 has central air conditioning, not a feature of the subject, suggesting a downward adjustment for this difference would be necessary. Nevertheless, these two comparables have improvement assessments of \$42,829 and \$46,000 or \$18.85 and \$23.66 per square foot of gross building area, respectively. The subject's improvement assessment of \$48,000 or \$22.55 per square foot of gross building area is greater than the two best comparables in the record in terms of total improvement assessment but is bracketed by these comparables on a per square foot basis. The subject's higher overall improvement assessment appears to be justified given the subject building has a basement apartment. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed. Therefore, based on this record the Board finds 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: _____

April 15, 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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