



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

APPELLANT: Mariusz Zeranski
DOCKET NO.: 08-24067.001-R-1 through 08-24067.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Mariusz Zeranski, the appellant, by attorney Lisa A. Marino of Marino & Assoc., PC in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
08-24067.001-R-1	12-36-111-049-0000	\$5,106	\$13,573	\$18,679
08-24067.002-R-1	12-36-111-050-0000	\$5,093	\$13,573	\$18,666

Subject only to the State multiplier as applicable.

ANALYSIS

The subject property is improved with a 1.5-story dwelling of masonry construction containing 2,093 square feet of living area. The dwelling is 58 years old. Features of the home include a full unfinished basement, central air conditioning and a two-car detached garage.

The appellant's appeal is based on unequal treatment in the assessment process. The appellant submitted information on three comparable properties described as frame, masonry or frame and masonry dwellings that range in age from 50 to 92 years old. The comparable dwellings range in size from 2,347 to 2,841 square feet of living area. Features include two-car garages. Two of the comparables have full unfinished basements and the third comparable has a partial basement with finished recreation room. Two of the comparables have central air conditioning. The comparables have improvement assessments ranging from \$27,507 to \$32,538 or from \$10.57 to \$11.72 per square foot of living area. The subject's improvement assessment is \$27,146 or \$12.97 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's final assessment was disclosed. The board of review presented descriptions and assessment information on four comparable properties consisting of 1.5-story masonry dwellings that range in age from 56 to 58 years old. The dwellings range in size from 1,844 to 2,293 square feet of living area. Features include full basements, central air conditioning and two or three-car garages. One comparable has a finished recreation room in the basement. These properties have improvement assessments ranging from \$28,545 to \$34,704 or \$13.74 to \$15.48 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

After reviewing the record and considering the evidence, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal. The Board further finds a reduction in the subject's assessment is not warranted.

The appellant contends unequal treatment in the subject's improvement assessment as the basis of the appeal. Taxpayers who object to an assessment on the basis of lack of uniformity bear the burden of proving the disparity of assessment valuations by clear and convincing evidence. Kankakee County Board of Review v. Property Tax Appeal Board, 131 Ill.2d 1 (1989). After an analysis of the assessment data, the Board finds the appellant has not met this burden.

The Board finds comparables 1 and 4 submitted by the board of review were most similar to the subject in size, style, exterior construction, features and age. Due to their similarities to the subject, these comparables received the most weight in the Board's analysis. Appellant's comparable number 3 and board of review comparable number 2 were also relatively similar to the subject with only minor adjustments necessary in comparison to the subject. The Board gave little weight to appellant's comparables numbers 1 and 2. These comparables were 31% and 36%, respectively, larger than the subject. Comparable 1 was also significantly older than the subject at 92 years old. The Board finds that these two comparables would require significant increases to their per square foot assessments to be reflective of the subject property. The Board further finds the most similar comparables had improvement assessments that ranged from \$11.72 to \$15.48 per square foot of living area. The subject's improvement assessment of \$12.97 per square foot of living area is within the range established by the most similar comparables. After considering adjustments and the differences in both parties' comparables when compared to the subject, the Board finds the subject's improvement assessment is equitable and a reduction in the subject's assessment is not 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.

Ronald R. Cuit

Chairman

Frank J. Huff

Member

Member

Mario M. Louie

Member

J.R.

Member

DISSENTING: _____

C E R T I F I C A T I O N

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: May 24, 2013

Allen Castrovillari

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 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 the subsequent year 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.

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.