



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

APPELLANT: JPSR-Thomas 2344, LLC  
DOCKET NO.: 21-30597.001-R-1  
PARCEL NO.: 17-06-304-020-0000

The parties of record before the Property Tax Appeal Board are JPSR-Thomas 2344, LLC, the appellant, by attorney Noah J. Schmidt, of Schmidt Salzman & Moran, Ltd. 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:** \$25,200  
**IMPR.:** \$71,498  
**TOTAL:** \$96,698

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 2021 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 3-story apartment building of masonry construction with 5,060 square feet of gross building area which is approximately 106 years old.<sup>1</sup> Features of the building include six bathrooms and a full unfinished basement. The property has a 3,600 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property<sup>2</sup> 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 five equity

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<sup>1</sup> Some descriptive information not provided by the appellant was drawn from the evidence submitted by the board of review and not refuted by the appellant via a rebuttal filing.

<sup>2</sup> Apartment building with 2 to 6 units, any age.

comparables located in the same assessment neighborhood code as the subject property. The comparables consist of 3-story, class 2-11 apartment buildings of masonry or frame and masonry construction ranging in size from 4,599 to 5,229 square feet of gross building area and ranging in age from approximately 98 to 120 years old. The comparables are described as each having three to six bathrooms and a full basement, two of them being finished with an apartment. Three comparables have a 3.5-car garage. The comparables have improvement assessments that range from \$31,278 to \$50,059 or from \$5.98 to \$10.70 per square foot of gross building area. The appellant also submitted the property information sheets from the Cook County Assessor's database for each comparable property. Based on this evidence, the appellant requested a reduction to the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$96,698. The subject property has an improvement assessment of \$71,498 or \$14.13 per square foot of gross building area. In support of its contention of the correct assessment, the board of review submitted information on eight equity comparables<sup>3</sup> located within the same assessment neighborhood code as the subject and within the same block as the subject property. The comparables consist of 3-story, class 2-11 apartment buildings of masonry construction ranging in size from 5,229 to 5,904 square feet of gross building area and ranging in age from 101 to 108 years old. Each comparable features six bathrooms and a full or partial unfinished basement. One comparable has a 2-car garage. The comparables have improvement assessments ranging from \$74,800 to \$118,800 or from \$14.18 to \$20.12 per square foot of gross building area.

### **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 thirteen equity comparables in support of their positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparable #1 as it appears to be an outlier given its low assessment relative to all the other comparables in the record. The Board also gives less weight to appellant's comparables #2, #3, and #5, along with board of review comparable #5 based on each of these properties having a garage which the subject lacks. Additionally, appellant's comparables #3 and #5 each have a finished basement which the subject lacks. The Board also gives less weight to board of review comparables #3, #4, #6, #7, and #8 due to their gross building sizes being from approximately 12% to 17% larger than the subject. The Board finds the best evidence of assessment equity to be appellant's comparable #4, along with board of review comparables #1 and #2. These comparables are most

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<sup>3</sup> The Board has re-numbered the parties' comparables on the second page of their respective grids for clarity and ease of reference.

similar to the subject in basement finish, location, gross building size, age, design, and features. The most similar comparables in the record have improvement assessments ranging from \$49,125 to \$78,870 or from \$10.68 to \$14.88 per square foot of gross building area. The subject's improvement assessment of \$71,498 or \$14.13 per square foot of gross building area falls within the range established by four most similar comparables in the record both in terms of overall improvement assessment and per square foot of gross building area basis.

After considering adjustments to the best comparables for any differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement 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: \_\_\_\_\_

May 20, 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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