



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

APPELLANT: 1649 W. Cortland, LLC
DOCKET NO.: 21-30604.001-R-1
PARCEL NO.: 14-31-414-056-0000

The parties of record before the Property Tax Appeal Board are 1649 W. Cortland, LLC, the appellant, by attorney Ciarra 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: \$21,308
IMPR.: \$87,597
TOTAL: \$108,905

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 mixed-use building of masonry construction with 4,813 square feet of gross building area which is approximately 14 years old.¹ The building was built on a concrete slab foundation and features eight bathrooms and central air conditioning. The property has a 3,044 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-12 property² under the Cook County Real Property Assessment Classification Ordinance.

¹ 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.

² Mixed-use commercial/residential building with apartment and commercial area totaling 6 units or less and below 20,000 square feet of gross building area.

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 comparables³ located in the same assessment neighborhood code as the subject property. The comparables consist of 2-story or 3-story, class 2-12 mixed-use buildings of masonry construction ranging in size from 4,416 to 4,944 square feet of gross building area and ranging in age from approximately 48 to 108 years old. The comparables are described as each having two to six full baths and a partial or a full unfinished basement. Two comparables have central air conditioning. The comparables have improvement assessments that range from \$63,295 to \$73,666 or from \$13.58 to \$14.90 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 \$108,905. The subject property has an improvement assessment of \$87,597 or \$18.20 per square foot of gross building area. In support of its contention of the correct assessment, the board of review submitted two grids with information on eight equity comparables located within the same assessment neighborhood code as the subject and within ¼ of a mile or within the same "subarea" as the subject property. The comparables consist of 2-story and 3-story, class 2-12 mixed-use buildings of masonry construction ranging in size from 3,085 to 6,490 square feet of gross building area and ranging in age from approximately 7 to 123 years old. Each comparable features from two to seven full baths and six have an additional half-bath. Four comparables have a partial or full unfinished basement; four comparables have concrete slab foundations; seven comparables have central air conditioning; and four comparables have from a 1.5-car to a 4-car garage. The comparables have improvement assessments ranging from \$88,200 to \$171,293 or from \$18.79 to \$30.86 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 gave less weight to appellant's comparables along with board of review comparables #5, #6, and #7 which are significantly older in age relative to the subject building. The Board also gave less weight to board of review comparables #1, #3, #4, and #5 due to their garage features which the subject lacks or significantly differing size of

³ As both parties submitted multiple pages of grid analyses, the Board has renumbered the comparables for clarity and ease of reference.

building area. Additionally, board of review comparable #3 appears to be an outlier given its inexplicably higher improvement assessment compared to the remaining improvements in the record. On this record, the Board finds the best evidence of assessment equity to be board of review comparables #2 and #8 which are most similar to the subject overall in location, age, foundation, and features. The best comparables in the record have improvement assessments of \$88,200 and \$109,200 or \$21.51 and \$26.63 per square foot of gross building area. The subject's improvement assessment of \$87,597 or \$18.20 per square foot of gross building area falls below the range established by the most similar comparables in the record both in terms of overall improvement assessment and on a 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: June 17, 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

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

APPELLANT

1649 W. Cortland, LLC, by attorney:
Ciarra Schmidt
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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