



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

APPELLANT: CB 1528, LLC
DOCKET NO.: 21-30611.001-R-1
PARCEL NO.: 16-01-205-049-0000

The parties of record before the Property Tax Appeal Board are CB 1528, 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: \$14,112
IMPR.: \$44,978
TOTAL: \$59,090

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 3,564 square feet of gross building area which is approximately 125 years old.¹ Features of the building include 3 baths, a full unfinished basement, central air conditioning, and a 2-car garage. The property has a 3,136 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property² 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

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 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 2-story or 3-story, class 2-11 apartment buildings of frame or masonry construction ranging in size from 3,242 to 3,844 square feet of gross building area and ranging in age from approximately 32 to 118 years old. The comparables each have three or four full bathrooms; three comparables have a full basement, one of which is finished with an apartment; one comparable has central air conditioning; and three properties have from 1.5-car to a 4-car garage. The comparables have improvement assessments that range from \$13,238 to \$28,539 or from \$3.62 to \$7.42 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 \$59,090. The subject property has an improvement assessment of \$44,978 or \$12.62 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 located within the same assessment neighborhood code as the subject and within ¼ of a mile from the subject property. The comparables consist of 2-story or 3-story, class 2-11 apartment buildings of masonry construction ranging in size from 3,432 to 3,690 square feet of gross building area and ranging in age from 98 to 123 years old. Each comparable features three or four bathrooms and a full basement, two of which are finished with an apartment or a formal recreation room; one comparable has central air conditioning; and two comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$46,332 to \$47,937 or from \$12.69 to \$13.58 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 nine equity comparables in support of their positions before the Property Tax Appeal Board. The Board gives less weight to appellant's comparables #1 and #2, along with board of review comparables #2 and #4 based on their lack of a garage which is a feature of the subject property. Additionally, appellant's comparables #1 and #2 are significantly newer in age being 32 and 39 years old compared to the subject being 125 years old. The Board also gave less weight to appellant's comparable #3 based on its lack of a basement, dissimilar to the subject having an unfinished basement. On this record, the Board finds appellant's comparables #4 and #5, along with board of review comparables #1 and #3 to be overall most similar to the subject in location, age, size, foundation, and some features. However, appellant's comparable #5 and board of review comparable #3 both have finished basements unlike the subject, suggesting that downward adjustments are necessary to these comparables in order to

make them more equivalent to the subject. Also, appellant's comparables #3 and #4 and board of review comparable #1 each lack central air conditioning which is a feature of the subject, suggesting that upward adjustments are needed for this difference from the subject. The Board finds that the best comparables in the record have improvement assessments ranging from \$23,063 to \$46,825 or from \$6.22 to \$13.58 per square foot of gross building area. The subject's improvement assessment of \$44,978 or \$12.62 per square foot of gross building area falls within the range established by the best equity comparables in this record.

After considering adjustments to the best comparables for differences from the subject such as basement finish and central air conditioning features, 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

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