



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

APPELLANT: The Four Amigos, LLC
DOCKET NO.: 21-31050.001-R-1
PARCEL NO.: 14-31-110-022-0000

The parties of record before the Property Tax Appeal Board are The Four Amigos, LLC, the appellant, by attorney George J. Relias, of Relias Law Group, 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: \$22,225
IMPR.: \$53,775
TOTAL: \$76,000

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 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 2-story multi-family building of masonry exterior construction with 3,482 square feet of building area. The building is approximately 106 years old and features an unfinished basement. The property has an approximately 3,175 square foot site and is located in Chicago, West 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on three comparable sales located in the same assessment neighborhood code and within 0.70 of a mile from the subject property. The comparables each have a 2,400 square foot site improved with a 2-story or 3-story class 2-11 multi-family building of masonry exterior construction ranging in size from 3,448 to 3,801 square feet of building

area.¹ The buildings range in age from 96 to 143 years old. Each comparable has a basement, one of which is finished with an apartment. One comparable has a 2-car garage.² The properties sold from February 2019 to January 2020 for prices ranging from \$650,000 to \$760,000 or from \$173.19 to \$203.02 per square foot of building area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$66,779 which reflects a market value of \$667,790 or \$191.78 per square foot of building area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$76,000. The subject's assessment reflects a market value of \$760,000 or \$218.27 per square foot of building area, land included, when applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located in the same assessment neighborhood code, ¼ of a mile from or within the subject's subarea. The comparables have sites with 2,400 or 3,000 square feet of land area and are improved with 2-story class 2-11 buildings of masonry exterior construction ranging in size from 3,150 to 3,615 square feet of building area. The buildings range in age from 101 to 123 years old. Three comparables have a basement, with two having finished area and one property has a concrete slab foundation. One building has central air conditioning and two properties have a 2-car garage. Comparable #2 has "other improvements" not further described. The comparables sold from February 2018 to December 2021 for prices ranging from \$836,000 to \$1,250,000 or from \$231.26 to \$349.06 per square foot of building area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In written rebuttal, the appellant argued, without documentation, that board of review comparables were incorrect and not located within the proximity reported in the board of review's grid analysis. The appellant further asserted that due to sales dates less proximate to the January 1, 2021 assessment date at issue, none of the board of review's comparables should be considered by the Board.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal, the value of the property must be proven by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

¹ Some property details for the appellant's comparables were disclosed in the Property Search Details submitted by the appellant.

² The appellant submitted the Multiple Listing Service sheet for its comparable #2 which disclosed the property has a 2-car garage.

The parties submitted seven comparables for the Board's consideration. The Board gives less weight to appellant comparables #2 and #3 along with board of review comparables #3 and #4 which sold from 17 months to 34 months prior to the January 1, 2021 assessment date.

The Board finds the best evidence of market value to be appellant comparable #1 and board of review comparables #1 and #2 which sold more proximate in time to the assessment date at issue. However, these three properties present varying degrees of similarity to the subject in age, building size, basement amenity and other features suggesting adjustments are needed to make these comparables more equivalent to the subject. These comparables sold from January 2020 to December 2021 for prices ranging from \$650,000 to \$1,250,000 or from \$173.19 to \$349.06 per square foot of building area, land included. The subject's market value of \$760,000 or \$218.27 per square foot of building area, land included, falls within the range established by the best comparables in this record. After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is justified 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. 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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