



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

APPELLANT: Patrick Thelen  
DOCKET NO.: 21-32368.001-R-1  
PARCEL NO.: 16-11-132-008-0000

The parties of record before the Property Tax Appeal Board are Patrick Thelen, the appellant, by Abby L. Strauss, attorney-at-law of Schiller Law P.C. 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:** \$3,671  
**IMPR.:** \$15,327  
**TOTAL:** \$18,998

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 is improved with a two-story multi-family building of masonry exterior construction containing 2,200 square feet of building area. The building is approximately 123 years old. Features of the property include a full unfinished basement, one fireplace, and two bathrooms. The property has a 3,125 square foot site located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 apartment building under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables composed of class 2-11 properties improved with buildings of masonry exterior construction that range in size from 2,450 to 2,498 square feet of building area. The buildings range in age from 107 to 133 years old. Three comparables have a full basement and one

comparable has a slab foundation. The comparables have two or three bathrooms and three comparables have a 1-car, 1.5-car, or 2-car garage. The comparables have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$8,328 to \$14,416 or from \$3.34 to \$5.88 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$10,142.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$18,998. The subject property has an improvement assessment of \$15,327 or \$6.97 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-11 properties improved with two-story buildings of masonry exterior construction that have 2,200 or 2,360 square feet of building area. The buildings are 113 or 123 years old. Three comparables have full unfinished basements and one comparable has a slab foundation. Each property has two bathrooms and two comparables have a 1-car or a 2-car garage. These properties have the same assessment neighborhood code as the subject and are described as being located in the same block as the subject. Comparables #1, #2 and #3 are located along the same street as the subject. Their improvement assessments range from \$15,328 to \$19,328 or from \$6.97 to \$8.19 per square foot of building area. The board of review contends the building assessed value per square foot for the comparables are equal or higher than the subject, which supports the 2021 assessed value as equitable.

### **Conclusion of Law**

The appellant 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 Board finds the best evidence of assessment equity to be the comparables submitted by the board of review which are more similar to the subject property in location and building size than are the comparables provided by the appellant. The board of review comparables have varying degrees of similarity to the subject that would require adjustments to make them more equivalent to the subject property. Board of review comparable #3 has a slab foundation whereas the subject has a full unfinished basement suggesting this comparable would require an upward adjustment for this difference. None of the board of review comparables have a fireplace as does the subject property indicating an upward adjustment to each property would be appropriate for this dissimilarity. Conversely, board of review comparables #1 and #4 each have a garage, unlike the subject property, suggesting each would require a downward adjustment to make them more equivalent to the subject for this difference. The board of review comparables have improvement assessments that range from \$15,328 to \$19,328 or from \$6.97 to \$8.19 per square foot of living area. The subject's improvement assessment of \$15,327 or \$6.97 per square foot of living area falls at the low end of the range on an overall basis as well as on a per square foot of living area basis as established by the best comparables in this record indicating the subject is not

being inequitably assessed when considering the appropriate adjustments to these comparables. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's 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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