



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

APPELLANT: MDI Holdings, LLC
DOCKET NO.: 21-33857.001-R-1
PARCEL NO.: 16-01-426-002-0000

The parties of record before the Property Tax Appeal Board are MDI Holdings, LLC, the appellant, by attorney David R. Bass, of Field and Goldberg, LLC 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: \$19,687
IMPR.: \$75,432
TOTAL: \$95,119

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 building of masonry exterior construction with 5,346 square feet of building area. The building is approximately 108 years old and features a basement finished with a recreation room. The property has a 4,375 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 assessment inequity regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables located within the same assessment neighborhood code as the subject and within 0.2 of a mile from the subject. The comparables are improved with 3-story, class 2-11 buildings of masonry exterior construction ranging in size from 4,917 to 5,703 square feet of building area. The buildings range in age from 65 to 131 years old. Each comparable has a basement finished

with a recreation room and two comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$53,313 to \$67,344 or from \$10.59 to \$12.03 per square foot of building area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to \$60,944.

The board of review submitted its "Board of Review Notes on Appeal" and evidence on July 31, 2023 disclosing the total assessment for the subject of \$95,199. The subject property has an improvement assessment of \$75,432 or \$14.11 per square foot of 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. The comparables are improved with 3-story, class 2-11 buildings of masonry exterior construction ranging in size from 5,337 to 5,772 square feet of building area. The buildings range in age from 103 to 116 years old. Each comparable has a basement, one of which is finished with a recreation room. One comparable has central air conditioning and one comparable has a 3-car garage. The comparables have improvement assessments ranging from \$81,077 to \$91,937 or from \$14.23 to \$17.23 per square foot of building area. Based on this evidence the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant argued the board of review did not present documentation of its comparables under Section 1910.65(c)(4) of the Board's procedural rules, after the burden shifted to the board of review to support the subject's assessment with substantive evidence under Section 1910.63(c).

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.

As an initial matter, the Board rejects the appellant's argument that the board of review's use of the Board's prescribed grid analysis form for its comparables is insufficient as "substantive, documentary evidence" required under Section 1910.63(c) of the Board's procedural rules. The Board finds Section 1910.80 of the Board's procedural rules requires parties to use the forms prescribed by the Board. Consistent with Section 1910.80, the Board has issued forms for boards of review that include a grid analysis to be used to present information on comparable properties. Pursuant to Standing Order No. 2 issued by the Board, all parties are required to present their comparables in the Board's prescribed grid analysis form for all matters filed after February 28, 2023. The board of review's evidence, including the grid analysis, was filed after February 28, 2023 and the use of the Board's prescribed grid analysis form for its comparables was required. Moreover, the Board finds the appellant did not refute any of the features or the assessments of the comparables presented by the board of review in written rebuttal.

The record contains a total of nine equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2, and #4 and the board of review's comparable #3, due to substantial differences from the subject in age, central air conditioning amenity, and/or garage amenity.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #5 and the board of review's comparables #1, #2, and #4, which are similar to the subject in building size, age, location, and features. These comparables have improvement assessments that range from \$65,813 to \$90,937 or from \$11.54 to \$16.11 per square foot of building area. The subject's improvement assessment of \$75,732 or \$14.11 per square foot of building area falls within the range established by the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, 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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