



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

APPELLANT: Halsted Properties, LLC
DOCKET NO.: 21-40470.001-R-1
PARCEL NO.: 14-28-311-090-0000

The parties of record before the Property Tax Appeal Board are Halsted Properties, LLC, the appellant, by attorney Abby L. Strauss 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: \$34,248
IMPR.: \$87,752
TOTAL: \$122,000

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 three-story mixed-use building of masonry exterior construction with 4,050 square feet of gross building area. The building is approximately 130 years old. Features of the building include a partial unfinished basement, central air conditioning, two full bathrooms and one-half bathroom. The property has a 2,854 square foot site and is located in Chicago, Lakeview Township, Cook County. The subject is classified as a class 2-12 property 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 four equity comparables, none of which have the same assessment neighborhood code as the subject. The

comparables are class 2-12 properties that are improved with two-story¹ or three-story mixed-use buildings of masonry or frame exterior construction ranging in size from 4,290 to 4,324 square feet of gross building area. The buildings are from 89 to 138 years old. The comparables each have a full or partial basement. No data was provided by the appellant concerning finished basement area. Each comparable has central air conditioning and from two to five full bathrooms. Comparable #1 has a 1.5-car garage. The comparables have improvement assessments that range from \$51,750 to \$65,500 or from \$11.97 to \$15.23 per square foot of gross building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$54,513 or \$13.46 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$122,000. The subject property has an improvement assessment of \$87,752 or \$21.67 per square foot of gross building area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables that have the same assessment neighborhood code as the subject and are located within the same block as the subject property, two of which are located on the same street as the subject. The comparables are class 2-12 properties that are improved with two-story or three-story mixed-use buildings of masonry exterior construction ranging in size from 3,300 to 4,896 square feet of gross building area. The buildings are from 123 to 138 years old. Each comparable has a partial unfinished basement, central air conditioning and two or three full bathrooms. Two comparables have either one or two half bathrooms. Comparable #1 has a 2-car garage. The comparables have improvement assessments that range from \$75,736 to \$111,592 or from \$22.79 to \$28.48 per square foot of gross building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, counsel for the appellant argued that board of review comparables differ from the subject in "living 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 seven comparable properties for the Board's consideration. The Board finds the appellant's comparables are most similar to the subject in building size, but less similar to the subject in location and each comparable has a different neighborhood code when compared to the subject. The Board finds the board of review comparables are most similar to

¹ The photographic evidence provided by the appellant depicts the buildings as either two-story or three-story designs.

the subject in location and each has the same assessment neighborhood code as the subject, but the buildings have varying degrees of similarity when compared to the subject. Nonetheless, the Board has given less weight to the appellant's comparable #4 and board of review comparable #3 due to their dissimilar two-story designs when compared to the subject's three-story design. Additionally, the appellant's comparables #4 is a considerably newer building.

The Board finds the appellant's comparables #1, #2 and #3, along with board of review comparables #1 and #2 are three-story mixed-use buildings, like the subject and are relatively similar to the subject in age and some features. However, these five comparables have varying degrees of similarity when compared to the subject in location and building size. The comparables have improvement assessments ranging from \$51,750 to \$111,592 or from \$11.97 to \$28.48 per square foot of gross building area. The subject's improvement assessment of \$87,752 or \$21.67 per square foot of gross building area falls within the range established by the best comparables in the record. Based on this record and after considering adjustments to the two best comparables for differences when compared to 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: _____

February 18, 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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