



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

APPELLANT: Virgin Island Properties, LLC
DOCKET NO.: 21-40812.001-R-1
PARCEL NO.: 14-18-330-028-0000

The parties of record before the Property Tax Appeal Board are Virgin Island 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: \$27,090
IMPR.: \$65,508
TOTAL: \$92,598

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 3-story mixed-use building of masonry exterior construction with 6,625 square feet of gross building area. The building is 133 years old. Features include a basement, central air conditioning and a 2-car garage. The property has a 3,010 square foot site and is located in Chicago, Lake View 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 regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four comparables located in different neighborhood codes than the subject. No data was provided regarding the proximity of the comparables to the subject. The comparables consist of class 2-12 mixed-use buildings of masonry exterior construction ranging in size from 6,528 to 6,741 square feet of gross building area. The buildings are 99 to 120 years old. Each building has a basement. Three

comparables each have central air conditioning, and one comparable has a 4-car garage. The comparables have improvement assessments ranging from \$14,974 to \$57,445 or from \$2.27 to \$8.65 per square foot of gross building area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to \$39,949.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$92,598. The subject property has an improvement assessment of \$65,508 or \$9.89 per square foot of building area.

In support of its contention of the correct assessment the board of review submitted information on four comparables located within the same neighborhood code as the subject. The comparables consist of 2-story or 3-story, class 2-11 or 2-12 buildings of masonry exterior construction ranging in size from 5,525 to 6,509 square feet of gross building area. The comparables are 115 to 129 years old. Three comparables each have a basement, and one comparable has a concrete slab foundation. Three comparables each have central air conditioning, and one comparable has 4 fireplaces. The comparables have improvement assessments ranging from \$54,631 to \$67,002 or from \$9.89 to \$10.90 per square foot of gross building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 record contains eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables due to differences in their neighborhood code, age, and/or other features when compared to the subject. Moreover, the appellant's comparables #1 and #2 appear to be outliers with their considerably lower improvements assessments relative to the other comparables in the record. The Board also gives less weight to the board of review comparables #1 and #3 due to their dissimilar foundation type and/or 2-11 classification code that differ in utility when compared to the subject which is a class 2-12 mixed-use property.

The Board finds the best evidence of assessment equity to be the board of review comparables #2 and #4 which have the same neighborhood and classification codes as the subject and are relatively similar to the subject in age and foundation type. However, these two comparables require upward adjustments for smaller dwelling size and/or lack of a garage amenity when compared to the subject. These two comparables have improvement assessments of \$54,631 and \$64,439 or for \$9.89 and \$9.90 per square foot of living area. The subject's improvement assessment of \$65,508 or \$9.89 per square foot of living area falls above these two comparables on an overall basis and equals the comparable that has the lower per-square-foot improvement

assessment. After considering adjustments to the two best comparables for differences from the subject, such as smaller dwelling sizes and/or garage amenity, 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

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: March 18, 2025

Clerk of the Property Tax Appeal Board

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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