FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Long River Investment, LLC
DOCKET NO.: 21-42177.001-R-1
PARCEL NO.: 17-28-211-002-0000

The parties of record before the Property Tax Appeal Board are Long River Investment, LLC, the appellant, by attorney Noah J. Schmidt, of Schmidt Salzman & Moran, 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:	$7,370
IMPR.:	$37,332
TOTAL:	$44,702

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, mixed-use building of frame and masonry exterior construction with 3,060 square feet of building area. The building is approximately 130 years old. Features include a partial basement.[1] The property has a 1,675 square foot site and is located in Chicago, South Chicago Township, Cook County. The subject is classified as a class 2-12 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant, through counsel, marked contention of law and lack of assessment equity concerning the improvement as the bases of the appeal. However, no contention of law was raised. In support of the inequity argument, the appellant submitted information on five comparables with the same assessment neighborhood code as the subject, along with property

[1] The board of review disclosed the subject has an unfinished partial basement, which was unrefuted by the appellant.

characteristics sheets that were used by the Board to verify, add, or correct some data in the grid analysis. The comparables are improved with 2-story, class 2-12 mixed-use buildings of frame exterior construction ranging in size from 2,944 to 3,120 square feet of building area. The buildings are either 127 or 128 years old. The comparables each have a partial basement. One comparable has a 2-car garage. The comparables have improvement assessments ranging from $15,700 to $18,272 or from $5.13 to $6.02 per square foot of building area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $44,702. The subject property has an improvement assessment of $37,332 or $12.20 per square foot of building area. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables that are located within the same assessment neighborhood code as the subject property. The comparables are improved with 2-story or 3-story, class 2-12 mixed-use buildings of frame or masonry exterior construction ranging in size from 3,030 to 3,150 square feet of building area. The buildings are either 111 or 130 years old. Each comparable has a full or partial basement. One comparable has central air conditioning. The comparables have improvement assessments ranging from $38,792 to $42,800 or from $12.31 to $13.90 per square foot of building area. Based on this evidence, the board of review requested the assessment be confirmed.

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 parties submitted eight suggested comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #5 which has a garage amenity, unlike the subject. The Board also gives less weight to the board of review comparable #3 which is less similar to the subject in age than the other comparables in this record and has central air conditioning, which is not a feature of the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 through #4 as well as board of review comparables #1 and #2 which are similar to the subject in location, class, age, dwelling size, and many features. These comparables have improvement assessments ranging from $15,700 to $42,800 or from $5.13 to $13.90 per square foot of building area. The subject's improvement assessment of $37,332 or $12.20 per square foot of building area falls within the range established by the best comparables in this record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate that the subject's improvement is inequitably assessed 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:

C E R T I F I C A T I O N

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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