



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

APPELLANT: IS 72nd St LLC
DOCKET NO.: 21-50406.001-R-1
PARCEL NO.: 20-29-214-001-0000

The parties of record before the Property Tax Appeal Board are IS 72nd St 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: \$3,953
IMPR.: \$12,046
TOTAL: \$15,999

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 2-story multi-family building of masonry exterior construction with 4,046 square feet of building area. The building is approximately 96 years old. Features of the building include a slab foundation and a 1-car garage. The property has a 6,083 square foot site and is located in Chicago, Lake 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 with respect to the subject's improvement as the basis of the appeal. In support of this argument the appellant submitted information on eight comparable properties that are located within the same neighborhood code as the subject. The comparables are improved with class 2-11 buildings of masonry exterior construction ranging in size from 3,384 to 4,018 square feet of building area. The buildings range in age from 95 to 128 years old and have full basements. The appellant did not disclose whether the basements were

unfinished or had finished basement area. Three comparables each have two fireplaces and three comparables have either a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$3,453 to \$6,523 or from \$.90 to \$1.81 per square foot of building area. Based on this evidence the appellant requested that the subject's improvement assessment be reduced to \$5,300 or \$1.31 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$15,999. The subject property has an improvement assessment of \$12,046 or \$2.98 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three comparable properties that are located within the same neighborhood code as the subject. The comparables are improved with class 2-11 buildings of masonry exterior construction ranging in size from 3,918 to 4,662 square feet of building area. The buildings range in age from 92 to 98 years old. The comparables have basements, two of which have finished area, and from a 2-car to a 3-car garage. The comparables have improvement assessments ranging from \$11,266 to \$16,937 or from \$2.88 to \$3.63 per square foot of building area. Based on this evidence the board of review requested confirmation of the subject's assessment.

The appellant submitted rebuttal arguing the board of review's comparable #4 had stucco exterior construction, unlike the subject's masonry exterior construction.

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 a total of 11 comparable properties for the Board's consideration, none of which have a slab foundation like the subject. Nevertheless, the Board finds the best evidence of assessment equity to be appellant's comparables #1, #3, #4 and #6, as well as the board of review's comparables #1 and #2. These comparables have varying degrees of similarity to the subject. However, two of the parties' best comparables lack a garage when compared to the subject, albeit one of the best comparables has finished basement area when compared to the subject. Nevertheless, the best comparables had improvement assessments that ranged from \$3,630 to \$14,461 or from \$.90 to \$3.41 per square foot of building area. The subject's improvement assessment of \$12,046 or \$2.98 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 subject's improvement assessment is supported. The Board gave less weight to the parties' remaining comparables, due to their differences in building size when compared to the subject. The Board

also finds the board of review did not have a fourth comparable property, or a comparable with stucco exterior construction, as described in the appellant's rebuttal. 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: _____

January 21, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

IS 72nd St LLC, by attorney:
Abby L. Strauss
Schiller Law P.C.
33 North Dearborn
Suite 1130
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602