



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

APPELLANT: Belden II Properties, LLC  
DOCKET NO.: 21-50488.001-R-1  
PARCEL NO.: 14-33-104-040-0000

The parties of record before the Property Tax Appeal Board are Belden II 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 **A Reduction** 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:** \$50,400  
**IMPR.:** \$67,068  
**TOTAL:** \$117,468

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 multi-family building of masonry exterior construction with 3,726 square feet of gross building area and which is approximately 129 years old. Features include a full unfinished basement, and 3 bathrooms. The property has a 4,032 square foot site and is located in Chicago, North 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 concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on eight equity comparables located in the same neighborhood code as the subject. The comparables consist of class 2-11 buildings of masonry exterior construction that are 119 to 142 years old. The buildings range in size from 3,834 to 4,224 square feet of gross building area. Features include 3



or 4 bathrooms. Six buildings have full or partial basements with no information on finished area, if any, and comparables #7 and #8 each have concrete slab foundations. Five comparables have central air conditioning and comparable #8 has two fireplaces. Comparables #3 through #6 each have a two-car garage. The comparables have improvement assessments ranging from \$59,875 to \$75,563 or from \$14.90 to \$17.89 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment of \$62,485 or \$16.77 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 \$134,980. The subject property has an improvement assessment of \$84,580 or \$22.70 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables which are located in the same neighborhood code and within ¼ of a mile from the subject. The comparables consist of class 2-11 three-story buildings of masonry exterior construction that are 118 to 133 years old. The buildings range in size from 3,132 to 4,456 square feet of gross building area. Three comparables have full basements, one of which has a formal recreation room, and comparable #3 has a concrete slab foundation. The comparables have 3 or 4 bathrooms, and comparables #1 and #4 have central air conditioning. Three comparables have either a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$80,147 to \$125,062 or from \$24.60 to \$29.30 per square foot of gross building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant noted the dwelling sizes of board of review comparables #1, #3 and #4 in comparison to the subject dwelling.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of twelve equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #4 as well as the board of review comparables, due to substantial differences in building sizes ranging from approximately 13% to nearly 20% when compared to the subject. The Board has given reduced weight to appellant's comparable #7, due to its slab foundation when compared to the subject's full unfinished basement. In addition, the Board has given reduced weight to appellant's comparables #2, #3 and #4, due to their air conditioning features when compared to the subject building which lacks this feature.



The Board finds the best evidence of assessment equity are appellant's comparables #1, #5 and #6, which are relatively similar to the subject in location, age, exterior construction, building size, and foundation type. Upward adjustments are necessary to each of these comparables for older ages when compared to the subject building. Upward adjustments are also necessary for the subject's smaller building size when compared to these three buildings as the principle of economies of scale indicates that if all other things are equal, a smaller structure will have a higher value on a per-square-foot basis than a larger structure. Two comparables also necessitate downward adjustments for their garage features, which is not an amenity of the subject. The best comparables in the record have improvement assessments ranging from \$59,875 to \$70,221 or \$14.90 and \$17.30 per square foot of gross building area. The subject's improvement assessment of \$84,580 or \$22.70 per square foot of gross building area falls above the range of the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of gross building area basis which appears to be excessive, even considering the subject's smaller building size and newer age.

Based on this record and after considering appropriate adjustments to the best comparables in the record for differences when compared to the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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.

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Chairman



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Member



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Member



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Member



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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



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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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