



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

APPELLANT: Urban Neighborhood Windy City Broadway II, LLC
DOCKET NO.: 22-33529.001-R-1
PARCEL NO.: 14-08-204-032-0000

The parties of record before the Property Tax Appeal Board are Urban Neighborhood Windy City Broadway II, LLC, the appellant, by attorney George J. Relias, of Relias Law Group, 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: \$16,160
IMPR.: \$40,711
TOTAL: \$56,871

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 2022 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 masonry exterior construction with 5,253 square feet of building area. The building is approximately 109 years old. Features of the building include a basement with finished recreation room and central air conditioning. The property has an approximately 2,020 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 with respect to the improvement as the basis of the appeal. The land assessment was not challenged. In support of this argument the appellant submitted a grid analysis and Property Search Details with information the subject and four equity comparables located in the same assessment neighborhood code and from 0.10 to 1.5 miles from the subject property. The comparables are improved with 2-story or 3-story class 2-

12 mixed-use buildings of masonry exterior construction ranging in size from 5,060 to 5,986 square feet of building area. The buildings range in age from approximately 110 to 129 years old. Each comparable has a basement, two of which are finished with either an apartment or a recreation room. One building has central air conditioning and one property has a 3-car garage. The comparables have improvement assessments ranging from \$27,149 to \$38,000 or from \$4.84 to \$7.51 per square foot of building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$29,914 or \$5.69 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 \$56,871. The subject property has an improvement assessment of \$40,711 or \$7.75 per square foot of building area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables located in the same assessment neighborhood code and in the subject's subarea. The comparables are improved with 2-story or 3-story class 2-12 mixed-use buildings of masonry exterior construction ranging in size from 4,325 to 5,471 square feet of building area. The buildings range in age from 99 to 113 years old. Three comparables have an unfinished basement and one comparable has a concrete slab foundation. One property has central air conditioning and three comparables have either a 1.5-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$41,953 to \$53,728 or from \$9.70 to \$10.90 per square foot of building area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In written rebuttal, the appellant argued that each of the board of review comparables present "fatal flaws" and should not be considered. The appellant contended these properties are not comparable to the subject due to differences in story height, site size, basement features and/or garage amenity.

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 equity comparables for the Board's consideration. The Board gives less weight to appellant comparable #2 along with board of review comparables #2, #3 and #4 which are less similar to the subject in foundation type, building size and/or garage amenity.

The Board finds the best evidence of assessment equity to be appellant comparables #1, #3 and #4 as well as board of review comparable #1 which are more similar to the subject in location, age and building size. However, three of these best comparables lack basement finished area and three of these properties each lack central air conditioning suggesting upward adjustments are

needed to make these properties more equivalent to the subject. These best comparables have improvement assessments ranging from \$27,149 to \$53,728 or from \$4.84 to \$9.82 per square foot of building area. The subject's improvement assessment of \$40,711 or \$7.75 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 from the subject the Board finds the appellant did not demonstrate with clear and convincing evidence the subject's improvement was 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

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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APPELLANT

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