



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

APPELLANT: Supreme Capital, LLC
DOCKET NO.: 22-48014.001-R-1
PARCEL NO.: 20-03-314-009-0000

The parties of record before the Property Tax Appeal Board are Supreme Capital, LLC, the appellant, by attorney Dora Cornelio, 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: \$18,497
IMPR.: \$21,981
TOTAL: \$40,478

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 apartment building of masonry construction with 6,216 square feet of gross building area which is approximately 118 years old. The building features five dwelling units, six full bathrooms, and a full basement finished with a recreation room.¹ The property has a 5,285 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-11 property² under the Cook County Real Property Assessment Classification Ordinance.

¹ The appellant has indicated in section III of the appeal petition (and reiterated in section V in the grid analysis) that the subject building has a finished basement. The board of review, on the other hand, has indicated in the grid analysis that the subject's basement is unfinished, but did not submit a property record card for the subject as required by Section 1910.40(a) of the PTAB rules. Based on these facts, the Board finds that the appellant's description of the subject's finished basement is more probative.

² Apartment building with 2 to 6 units, any age.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables located within the same assessment neighborhood code as the subject property. The comparables consist of 3-story, class 2-11 apartment buildings of masonry construction ranging in size from 5,643 to 6,505 square feet of gross building area and ranging in age from approximately 110 to 125 years old. The comparables are described as having from three to seven bathrooms, two or three dwelling units, and a full basement finished with a recreation room. One comparable has three fireplaces, and two comparables have a 2-car or a 3-car garage. The comparables have improvement assessments that range from \$8,310 to \$8,990 or from \$1.37 to \$1.58 per square foot of gross building area. The appellant also submitted property information sheets for each comparable property and a brief requesting a reduction to the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$40,478. The subject property has an improvement assessment of \$21,981 or \$3.54 per square foot of gross building area. In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located within the same subarea or ¼ of a mile from the subject and within the same assessment neighborhood code as the subject property. The comparables consist of 3-story, class 2-11 apartment buildings of masonry construction ranging in size from 5,841 to 6,100 square feet of gross building area and each being 128 years old. Each comparable features four or six full baths with comparable #1 having three additional ½ baths. Each comparable also has a full basement, two being finished with an apartment or a recreation room. One comparable has a 2-car garage. The comparables have improvement assessments ranging from \$23,385 to \$27,413 or from \$4.00 to \$4.49 per square foot of gross building area. The board of review argued that the subject parcel contains two improvements and that the board of review comparables are more similar to the subject and support the improvement 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 parties submitted a total of eight equity comparables in support of their positions before the Property Tax Appeal Board. The Board gave less weight to appellant's comparables #1 and #3 based on these buildings having lesser number of dwelling units relative to the subject. The Board also gave less weight to appellant's comparables #2 and #4, along with board of review comparable #1 due to each of these comparables having a garage which is not a feature of the subject property. Finally, the Board gave less weight to appellant's comparable #5 due to its significantly smaller gross building area relative to the subject building. On this record, the

Board finds the board of review comparables #2 and #3 to be most similar to the subject in location, age, gross building area, bathroom count, and finished basements. The best comparables in the record have improvement assessments of \$25,338 and \$27,413 or \$4.20 and \$4.49 per square foot of gross building area. The subject's improvement assessment of \$21,981 or \$3.54 per square foot of gross building area is lower than the two best comparables in the record both in terms of overall improvement assessment and on a per square foot of gross building area basis.

After considering adjustments to the best comparables for any differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement 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: _____

July 15, 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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