FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Armour Holdings, LLC
DOCKET NO.: 22-53763.001-R-1
PARCEL NO.: 17-33-201-026-0000

The parties of record before the Property Tax Appeal Board are Armour Holdings, LLC, the appellant, by attorney Brian S. Maher, of Weis, DuBrock, Doody & Maher 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:	$13,750
IMPR.:	$56,397
TOTAL:	$70,147

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 multi-family building of masonry exterior construction with 4,266 square feet of building area. The dwelling is approximately 128 years old and features a basement and six full bathrooms. The property has a 3,125 square foot site and is located in Chicago, South 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 regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables located within the same assessment neighborhood code as the subject. The comparables are improved with 2-story or 3-story multi-family buildings of masonry exterior construction ranging in size from 4,506 to 4,950 square feet of building area. The buildings range in age from 119 to 134 years old. Each comparable has a basement and three or four full bathrooms. Three comparables have a 2-car garage. The appellant did not disclose whether the comparables have any finished basement area. The comparables have improvement assessments ranging from $32,814 to $38,610 or from $7.28 to $8.10 per square foot of building area. Based on this evidence the appellant requested a reduction in the subject's improvement assessment to $33,147.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $70,147. The subject property has an improvement assessment of $56,397 or $13.22 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 within the same assessment neighborhood code as the subject. The comparables are improved with 2-story or 3-story class 2-11 buildings of masonry exterior construction ranging in size from 3,744 to 4,488 square feet of building area. The buildings range in age from 118 to 138 years old. Each comparable has a basement, one of which is finished with an apartment, and two to seven full bathrooms. One comparable has central air conditioning, one comparable has three half bathrooms, and two comparables have a 2-car garage. The comparables have improvement assessments ranging from $52,250 to $59,250 or from $13.20 to $14.22 per square foot of building area. Based on this evidence the board of review requested confirmation of the subject's 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 record contains a total of eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1 and #2 and the board of review's comparable #2, due to substantial differences from the subject in design and/or building size.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #4 and the board of review's comparables #1, #3, and #4, which are more similar to the subject in design, building size, age, location, and some features. However, four comparables each have a garage unlike the subject, one comparable has three half bathrooms unlike the subject, and one comparable has central air conditioning unlike the subject, suggesting downward adjustments to these comparables for these features would be needed for these features to make them more equivalent to the subject. Moreover, four comparables have fewer full bathrooms than the subject, suggesting upward adjustments for this feature would be needed.

These comparables have improvement assessments that range from $36,261 to $59,250 or from $7.90 to $13.52 per square foot of building area. The subject's improvement assessment of

$56,397 or $13.22 per square foot of building area falls within the range established by the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, 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:

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

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

APPELLANT

Armour Holdings, LLC, by attorney:
Brian S. Maher
Weis, DuBrock, Doody & Maher
1 North LaSalle Street
Suite 1500
Chicago, IL 60602

COUNTY

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