FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: 1947 Humboldt LLC
DOCKET NO.: 24-24738.001-R-1
PARCEL NO.: 13-36-304-004-0000

The parties of record before the Property Tax Appeal Board are 1947 Humboldt LLC, the appellant, by attorney Michael R. O'Malley, 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:	$21,000
IMPR.:	$112,000
TOTAL:	$133,000

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 2024 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 3,705 square feet of building area. The building is approximately 120 years old. Features of the building include a basement, finished with an apartment, central air conditioning and a 2-car garage. The property has an approximately 3,750 square foot site and is located in Chicago, West 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 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 in the same assessment neighborhood code as the subject property.[1] The

[1] The Property Index Numbers (PINs) of appellant comparables #4 and #6 begin with 16 while the subject's PIN begins with 13, indicating these two comparables are located in a different area of the township than the subject.

proximity of the appellant's comparables to the subject is reported as "unknown" in the grid. The comparables are improved with 2-story or 3-story class 2-11 buildings of frame, masonry, or frame and masonry exterior construction ranging in size from 3,343 to 3,999 square feet of building area. The buildings range from 123 to 136 years old. Each comparable has a basement, finished with either an apartment or recreation room. One building has central air conditioning and three comparables have either a 1.5-car or a 2-car garage. The comparables have improvement assessments ranging from $34,800 to $44,000 or from $10.02 to $11.63 per square foot of building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to $39,754 or $10.73 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 $133,000. The subject property has an improvement assessment of $112,000 or $30.23 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, same subarea or within ¼ of a mile from the subject property. The comparables are improved with 2-story or 3-story class 2-11 buildings of frame or masonry exterior construction ranging in size from 2,646 to 3,964 square feet of building area. The buildings are from 132 to 137 years old. Three comparables have a basement, two of which are finished with an apartment. One comparable has a concrete slab foundation and three dwellings have central air conditioning. The comparables have improvement assessments ranging from $102,334 to $122,213 or from $30.83 to $39.19 per square foot of building area.

The board of review's grid analysis also disclosed the subject property sold in June 2023 for a price of $1,500,000, which was not refuted by the appellant. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 nine equity comparables for the Board's consideration. The Board gives reduced weight to appellant comparables #4 and #5 along with board of review comparables #1 and #4 which are less similar to the subject in proximity, building size and/or foundation type.

The Board finds the best evidence of assessment equity to be appellant comparables #1, #2 and #3 as well as board of review comparables #2 and #3 which are more similar to the subject in location, age and building size. However, these properties present varying degrees of similarity to the subject in garage amenity and presence of central air conditioning suggesting adjustments are needed to make these properties more equivalent to the subject. These comparables have improvement assessments ranging from $34,800 to $122,213 or from $10.02 to $35.18 per

square foot of building area. The subject's improvement assessment of $112,000 or $30.23 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 that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

As a final point, the Board finds the subject's unrefuted 2023 sale price of $1,500,000 reflects a market value above the subject's 2024 total assessment, which undermines the appellant's argument.

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: October 20, 2026

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 9-215 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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