FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Saratoga Realty Investors
DOCKET NO.: 24-26241.001-R-1
PARCEL NO.: 17-17-410-016-0000

The parties of record before the Property Tax Appeal Board are Saratoga Realty Investors, the appellant, by attorney Michael R. Davies of Ryan Law, PLLC 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:	$16,016
IMPR.:	$76,802
TOTAL:	$92,818

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 two improvements situated on one parcel.[1] Improvement #1 is described as three-story multi-family building of masonry exterior construction with 2,742 square feet of gross building area. The building was constructed in 1888 and is approximately 136 years old. Features of the building include a full basement and three full bathrooms. Improvement #2 is described as a three-story multi-family building of frame and masonry exterior construction with 2,901 square feet of gross building area. The building was constructed in 1888 and is approximately 136 years old. The building features a full basement and six full

[1] The board of review disclosed in the "Board of Review - Notes on Appeal" that there are two improvements on the subject property. The board of review submitted copies of the subject's property characteristic printouts which depicts the subject property as a class 2-11 property improved with two separate multi-family buildings, where the second improvement was not reported by nor was it refuted by the appellant. For ease of reference, the Board has numbered the buildings as improvement #1 and improvement #2.

bathrooms. The property has a site with approximately 2,862 square feet of land area 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 only Improvement #1 as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables that have the same assessment neighborhood code as the subject and are located from 1.97 of a mile to 2.39 miles from the subject property. The comparables are class 2-11 properties improved with two-story multi-family buildings of masonry exterior construction ranging in size from 2,792 to 3,107 square feet of gross building area. The buildings are from 100 to 146 years old. Each comparable has a full basement and either two or three full bathrooms. Two comparables each have a one-car garage. The comparables have improvement assessments that range from $30,880 to $40,880 or from $10.63 to $13.16 per square foot of gross building area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The appellant submitted a copy of the 2024 final decision issued by the Cook County Board of Review disclosing the total assessment for the subject of $92,818. The appellant reported the subject property has a total improvement assessment of $76,802.

The board of review submitted its "Board of Review Notes on Appeal," where the subject is identified with a Property Index Number (PIN) of 17-17-410-017-0000, which is not the subject PIN. The board of review submitted property characteristic printouts for Improvement #1 and Improvement #2, which depicted Improvement #1 with an improvement assessment of $37,319 or $13.61 per square foot of gross building area and Improvement #2 with an improvement assessment of $39,483 or $13.61 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 that have the same assessment neighborhood code as the subject and are located within the same block or approximately ¼ of a mile from the subject property, two of which are located along the same street as the subject. The comparables are class 2-11 properties improved with three-story buildings of masonry exterior construction ranging in size from 3,450 to 4,462 square feet of gross building area. The buildings are from 132 to 138 years old. The comparables each have a full basement and three or four full bathrooms. Two comparables each have either one or three additional half bathrooms. Comparable #1 has central air conditioning and a two-car garage. The comparables have improvement assessments that range from $67,000 to $115,692 or from $17.19 to $28.22 per square foot of gross 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.

Initially, the Board finds the appellant is only requesting a reduction in the improvement assessment for Improvement #1.

For Improvement #1, the parties submitted nine comparables for the Board’s consideration. The Board has given less weight to the appellant’s comparables #3 and #4 which feature a garage, unlike the subject and/or are less similar to the subject in age. The Board has given reduced weight to the four comparables submitted by the board of review, which have substantially larger building sizes, when compared to the subject. Additionally, board of review comparable #1 has central air conditioning and a garage, neither of which are features of the subject.

The Board finds the best evidence of assessment equity for Improvement #1 to be the appellant’s comparables #1, #2 and #5, which have the same assessment neighborhood code as the subject and are overall more similar to the subject in building size, age and some features. However, the Board finds all comparables are located approximately two or more miles from the subject and each building is a two-story design, when compared to the subject’s three-story design. Nevertheless, these three properties have improvement assessments ranging from $30,880 to $40,880 or from $10.63 to $13.16 per square foot of gross building area. Improvement #1 has an improvement assessment of $37,319 or $13.61 per square foot of gross building area, which falls within the range established by the best comparables in this record in terms of total improvement assessment but somewhat above the range on a per square foot of gross building area basis, which appears to be logical given the subject’s smaller building size. After considering the economies of scale and adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's Improvement #1 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

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: September 15, 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 9-125 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

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