FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: VICTORIA GARDENS LP
DOCKET NO.: 24-26243.001-R-1
PARCEL NO.: 17-20-406-040-0000

The parties of record before the Property Tax Appeal Board are VICTORIA GARDENS LP, 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 ***a reduction*** 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:	$9,157
IMPR.:	$42,714
TOTAL:	$51,871

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 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 two-story mixed-use building of frame exterior construction with 4,746 square feet of gross building area. The building is approximately 144 years old. Features of the property include a partial basement, four full bathrooms and one half bathroom. The property has a site with 2,475 square feet of land area and is located in Chicago, West Chicago 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. 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 1.24 to 2.51 miles from the subject. The comparables are class 2-12 properties improved with two-story or three-story mixed-use buildings of masonry exterior construction ranging in size from 4,761 to 5,078 square feet of gross building area. The buildings are 90 to 138 years old. The comparables each have a full or partial basement and three or four full bathrooms. Three comparables each have an additional half bathroom. Comparable #4 has a two car garage. The comparables have improvement assessments that range from $41,060 to $44,530 or from $8.45 to $8.79 per square foot of gross building area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The appellant also submitted a copy of the Cook County Board of Review decision for the 2024 tax year disclosing the subject property had total assessment of $57,472. The subject property has an improvement assessment of $48,315 or $10.18 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal." In support of its contention of the correct assessment the board of review submitted information on three equity comparables, none of which are located in the subject's assessment neighborhood. The comparables are class 2-12 properties improved with two-story or three-story mixed-use buildings of masonry exterior construction ranging in size from 7,000 to 7,650 square feet of gross building area. The buildings are from 129 to 157 years old. One comparable has a slab foundation and two comparables each have a full or partial basement. Each comparable has four or six full bathrooms. Two comparables have central air conditioning. Comparable #2 has a two-car garage. The comparables have improvement assessments that range from $111,370 to $157,829 or from $14.80 to $21.18 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted eight comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables #1, #2 and #4 due to differences from the subject in story height and/or age. The Board has given less weight to the three comparables submitted by the board of review due to their substantially larger building sizes, when compared to the subject and their location outside of the subject's assessment neighborhood.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #5, which have the same assessment neighborhood code as the subject and are overall more similar to the subject in building size, story height and age. However, each building has a fewer number of bathrooms when compared to the subject, suggesting upward adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables have improvement assessments of $41,060 and $44,530 or $8.62 and $8.79 per square foot of gross building area. The subject's improvement assessment of $48,315 or $10.18 per square foot of gross building area falls above the two best comparables in the record. However, after considering adjustments to the best comparables for differences from the subject, the Board finds the subject's improvement assessment is excessive. Based on this record, the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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

AGENCY

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