FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Victoria Gardens LP
DOCKET NO.: 24-26599.001-R-1
PARCEL NO.: 17-21-302-019-0000

The parties of record before the Property Tax Appeal Board are Victoria Gardens LP, the appellant, by Michael R. Davies, attorney-at-law 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:	$10,197
IMPR.:	$53,003
TOTAL:	$63,200

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 is improved with a two-story multi-family building of frame construction that contains 5,308 square feet of building area. The building is approximately 136 years old. Features of the property include a full basement finished with an apartment and four bathrooms. The property has a 2,756 square foot site located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 apartment building under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-11 properties improved with two-story or three-story multi-family buildings of frame, masonry or frame and masonry exterior construction that range in size from 5,400 to 6,080 square feet of building area. The buildings are from 123 to 146 years old.

Four comparables have full basements and one comparable has a slab foundation and four comparables have 2-car garages. The comparables have 3, 4, 5 or 6 bathrooms. The comparables have the same neighborhood code as the subject property and are located from .32 of a mile to 2.4 miles from the subject property. These properties have total assessments ranging from $62,721 to $74,000 and improvement assessments ranging from $31,807 to $58,586 or from $5.76 to $9.89 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to $43,738.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $86,000 The subject property has an improvement assessment of $75,803 or $14.28 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 composed of three class 2-11 properties and one class 2-12 mixed use property improved with two-story or three-story buildings of masonry exterior construction that range in size from 3,889 to 5,361 square feet of building area. The comparables are 135 to 137 years old. Each comparable has a full basement with two being finished with apartments. One comparable has a 1-car. The comparables have 3 or 4 full bathrooms and comparables #3 and #4 have additional 4 and 3 half bathrooms, respectively. The comparables have the same neighborhood code as the subject property. Their improvement assessments range from $56,028 to $107,167 or from $14.34 to $19.99 per square foot of building area. The board of review asserted that the building assessed value per square foot for the comparables are the same or higher than the subject, which supports the assessed value as equitable.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of assessment equity to be the appellant's comparables that are most similar to the subject in size. The comparables have varying degrees of similarity to the subject in style and features. The comparables have improvement assessments ranging from $31,807 to $58,586 or from $5.76 to $9.89 per square foot of building area. The subject's improvement assessment of $75,803 or $14.28 per square foot of building area falls above the range established by the best comparables in this record indicating the property is being inequitably assessed. Less weight is given to the board of review comparables as comparable #3 is a different class mixed-use property and comparables #1, #2 and #4 differ from the subject in size being approximately 20% to 27% smaller than the subject building. Based on this record the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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: 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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