FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Elizabeth Park Ltd Partnership
DOCKET NO.: 24-26604.001-R-1
PARCEL NO.: 17-21-304-060-0000

The parties of record before the Property Tax Appeal Board are Elizabeth Park Ltd Partnership, 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:	$10,268
IMPR.:	$62,766
TOTAL:	$73,034

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 composed of a 2,775 square foot site improved with two buildings. Improvement #1 is composed of a 3-story building of masonry exterior construction that contains 4,554 square feet of building area that was built in 1890. Features of the building include a slab foundation and four bathrooms. Improvement #2 is composed of a two-story building of frame exterior construction that contains 1,470 square feet of building area that was built in 1890. Features of the building include a partial basement and two bathrooms. The property is in Chicago, West Chicago Township, Cook County. The subject is a class 2-12 mixed use property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. The appellant, however, presented an assessment inequity analysis associated with improvement #1 and did not provide an assessment equity analysis for improvement #2 located

on the subject site. In support of this argument the appellant submitted information on five equity comparables consisting of class 2-12 properties improved with two-story or three-story buildings of masonry exterior construction that range in size from 4,518 to 5,078 square feet of building area. The buildings are from 90 to 138 years old. Each comparable a has a partial or full basement and 2½, 3½ or 4 bathrooms. One comparable has a 2-car garage. The comparables have the same neighborhood code as the subject and are located from 1.51 to 2.88 miles from the subject property. The comparables have improvement assessments ranging from $38,883 to $44,213 or from $8.45 to $8.76 per square foot of building area. In the appellant's analysis the subject's total improvement assessment was assigned to improvement #1 indicating the building had an improvement assessment of $90,190 or $19.80 per square foot of building area. The appellant requested the subject have an improvement assessment of $39,210.

The appellant submitted a copy of the final decision issued by the board of review disclosing the property had a total assessment of $100,458 and further indicated the subject had an improvement assessment of $90,190.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject property is improved with two class 2-12 buildings with a combined 6,024 square feet of building area. The board of review indicated the subject property has an improvement assessment of $14.97 per square foot of building area when dividing the improvement assessment of $90,190 by the subject's combined building area. The board of review provided the dwelling characteristics for each of the buildings located on the subject property. Improvement #1 has an improvement assessment of $67,317 or $14.78 per square foot of building area. Improvement #2 has an improvement assessment of $22,873 or $15.56 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 consisting of class 2-11 properties improved with two-story buildings of frame or masonry exterior construction that range in size from 1,524 to 2,520 square feet of building area and are 134 to 157 years old. Two comparables have full basements with one having finished area, one comparable has a crawl space foundation and one comparable has a slab foundation. The comparables have two or three bathrooms. One comparable has central air conditioning and two comparables have two-car garages. These properties have the same neighborhood code as the subject property and are located ¼ of a mile from the subject property. Their improvement assessments range from $22,814 to $38,150 or from $14.75 to $15.92 per square foot of building area. The board of review contends the comparables have an average improvement assessment of $15.19 which is higher than the subject, which supports the 2024 assessment 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 did not meet this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the subject property is improved with two buildings; however, the appellant presented an assessment equity analysis only for improvement #1 located on the subject site composed of a class 2-12 three-story building of masonry exterior construction with 4,554 square feet of building area that is approximately 134 years old. The comparables presented by the appellant have the same classification code and neighborhood code as improvement #1 and are similar to the building in size and age. These properties have varying degrees of similarity to the subject building in features. These comparables have improvement assessments that range from $38,883 to $44,213 or from $8.45 to $8.76 per square foot of building area. The subject building has an improvement assessment of $67,317 of $14.78 per square foot of building area falls above the range established by the best comparables in this record.

With respect to improvement #2 the Board finds the appellant presented no evidence to challenge the correctness of the assessment of this building, therefore, no change in the improvement assessment of this building is warranted.

The Board gives little weight to the board of review comparables which are not as similar to improvement #1 in classification and size as are the comparables presented by the appellant. Additionally, the board of review comparables are not similar to the improvement #2 in classification and size and are not similar to the combined building area of the subject property.

Based on this record the Board finds the appellant demonstrated with clear and convincing evidence that the improvement #1 located on the subject site is inequitably assessed and a reduction in the subject's assessment 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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