



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Pilsen East Mall LP
DOCKET NO.: 24-26608.001-R-1
PARCEL NO.: 17-21-312-001-0000

The parties of record before the Property Tax Appeal Board are Pilsen East Mall 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: \$9,805
IMPR.: \$47,979
TOTAL: \$57,784

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 masonry exterior construction containing 5,566 square feet of building area. The building is approximately 153 years old. Features of the property include a partial basement and 4½ bathrooms. The property has a 2,650 square foot site and 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. In support of this argument the appellant submitted information on five equity comparables composed of class 2-12 mixed-use buildings of masonry exterior construction that range in size from 5,727 to 6,384 square feet of building area that are from 119 to 143 years old. Each property has a full or partial basement and 2½, 3½ or 5½ bathrooms. Two comparables

have a 1-car or 2-car garage. The comparables have the same neighborhood code as the subject property and are located 1.10 to 1.95 miles from the subject property. The comparables have improvement assessments ranging from \$44,800 to \$54,900 or from \$7.82 to \$8.80 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$46,198.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$78,378. The subject property has an improvement assessment of \$68,573 or \$12.32 per square foot of building area. In support of its contention of the correct assessment the board of review submitted information on three equity comparables composed of class 2-12 mixed-use properties improved with three-story buildings of frame or masonry construction that range in size from 5,751 to 6,912 square feet of building area. One comparable has a slab foundation and two comparables have partial basements. One comparable has central air conditioning and two comparables have a 1-car or 2-car garage. The comparables have 4½, 6 or 7½ bathrooms. These properties have the same neighborhood code as the subject property. The comparables have improvement assessments that range from \$70,860 to \$82,239 or from \$11.81 to \$12.61 per square foot of building area.

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 parties submitted information on eight equity comparables to support their respective positions. The Board gives less weight to appellant's comparables #3 and #5 due to differences from the subject in style, each being improved with a three-story building while the subject is improved with a two-story building. The Board gives less weight to the board of review comparables due to differences from the subject in style, foundation, central air conditioning amenity and/or size. The Board finds the best evidence of assessment equity to be appellant's comparables #1, #2 and #4 that are improved with two-story mixed-use buildings that range in size from 5,727 to 6,384 square feet of building area. Two comparables have one or two fewer bathrooms than the subject property necessitating upward adjustments for these differences. One comparable has one more bathroom than the subject and one comparable has a 1-car garage, unlike the subject, requiring downward adjustments. These three comparables have improvement assessments that range from \$44,800 to \$53,883 or from \$7.82 to 8.62 per square foot of building area. The subject's improvement assessment of \$68,573 or \$12.32 per square foot of building area falls above the range established by the best comparables in this record. 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 not 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: _____

CERTIFICATION

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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