



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

APPELLANT: Elizabeth Park Ltd Partnership
DOCKET NO.: 24-26612.001-R-1
PARCEL NO.: 17-21-312-005-0000

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 **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: \$33,578
IMPR.: \$67,423
TOTAL: \$101,001

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 and masonry construction containing 4,968 square feet of building area. The building is approximately 110 years old. Features of the property include a full basement, central air conditioning, and six bathrooms. The property has a 9,075 square foot site located in Chicago, West Chicago Township, Cook County. The subject is 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 consisting of class 2-11 properties improved with two-story or three-story multi-family buildings of masonry or frame and masonry construction that range in size from 4,952 to 5,889 square feet of building area. The buildings are from 131 to 140 years old. Four

comparables have full basements, one comparable has a slab foundation and three comparables have two-car garages. The comparables have 3, 4, 5 or 6 bathrooms. These properties have the same neighborhood code as the subject property and are located from .31 to 2.39 miles from the subject property. Their improvement assessments range from \$31,807 to \$52,068 or from \$5.76 to \$9.94 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$42,526.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$101,001. The subject property has an improvement assessment of \$67,423 or \$13.57 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 class 2-11 properties improved with three-story multi-family buildings of masonry exterior construction that range in size from 3,906 to 4,599 square feet of building area. The comparables are from 73 to 147 years old. Each property has a full basement with comparable #4 having a basement finished with an apartment. Three comparables have two-car garages. The comparables have 3, 4, 6 or 6½ bathrooms. These properties have the same neighborhood code as the subject property. Their improvement assessments range from \$56,028 to \$63,989 or from \$13.89 to \$14.34 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on nine equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparables #1 and #2 due to differences from the subject in building size and the fact the improvement assessment for comparable #1 is an outlier that is significantly below the next lowest comparable on a per square foot basis. The Board gives less weight to appellant's comparable #5 due to differences from the subject in foundation. The Board gives less weight to board of review comparables #1 and #2 due to differences from the subject in size. The Board gives less weight to board of review comparable #4 due to differences from the subject in age. The Board finds the best evidence of assessment equity to be appellant's comparables #3 and #4 as well as board of review comparable #3 that range in size from 4,599 to 5,400 square feet of building area and are 131 or 135 years old. Appellant's comparables #3 and #4 require upward adjustments as each property has three less bathrooms than the subject and no central air conditioning, a feature of the subject property. Board of review comparable #3 would require an upward adjustment as this property has no central air conditioning, unlike the subject property. Conversely, appellant's comparable #4 and board of review comparable #3 each have a two-car garage while the subject has no garage indicating downward adjustments to these two comparables would be proper for this difference. Additionally, board of review comparable #3

has an additional half bathroom that the subject does not have, suggesting a downward adjustment would be appropriate. These comparables have improvement assessments that range from \$43,438 to \$63,900 or from \$8.77 to \$13.89 per square foot of building area. The subject's improvement assessment of \$67,423 or \$13.57 per square foot of building area falls above the range of the total improvement assessments but is within the range on a per square foot of living area basis as established by the best comparables in this record. Based on this record, after considering the appropriate adjustments to the best comparables due to differences from the subject property, the Board finds the appellant did not demonstrate 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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