



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

APPELLANT: Gallery Square LP
DOCKET NO.: 24-26618.001-R-1
PARCEL NO.: 17-21-313-006-0000

The parties of record before the Property Tax Appeal Board are Gallery Square 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 **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: \$9,250
IMPR.: \$76,750
TOTAL: \$86,000

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 three-story mixed-use building of masonry exterior construction that contains 6,525 square feet of building area. The building is approximately 143 years old. Features of the property include a partial basement and 4½ bathrooms. The property has a 2,500 square foot site located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-12 mixed-use commercial/residential 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 2-12 properties improved with three-story mixed-use buildings of masonry exterior construction that range in size from 6,516 to 7125 square feet of building area and are from 117 to 134 years old. Each property has full or partial basement. Three

comparables have a 1.5-car or 2-car garage. The comparables have 3½, 4 or 5½ bathrooms. These properties have the same neighborhood code as the subject and are located from .66 to 2.17 miles from the subject property. Their improvement assessments range from \$35,950 to \$61,438 or from \$5.45 to \$8.62 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$50,438.

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 \$76,750 or \$11.76 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 or 2-12 properties improved with three-story multi-family or mixed-use buildings of masonry or frame exterior construction that range in size from 5,100 to 6,178 square feet of building area. Three comparables have full basements with formal recreation rooms and one comparable has a slab foundation. One comparable has central air conditioning, one comparable has a 1-car garage, and the comparables have 3, 4½ or 5½ bathrooms. The comparables have the same neighborhood code as the subject property with three comparables being located along the same street as the subject property. Their improvement assessments range from \$62,103 to \$73,120 or from \$11.81 to \$12.18 per square foot of building area. The board of review contends 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 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 to support their respective positions. The Board gives less weight to appellant's comparable #1 as the improvement assessment is an outlier that is significantly below the assessment of the next lowest comparable on a per square foot of building area basis. The Board gives less weight to appellant's comparables #2 through #5 as they are not as similar to the subject in location as the best comparables in this record. The Board gives less weight to board of review comparables #3 and #4 due to differences from the subject in building size. The Board finds the best evidence of assessment equity to be board of review comparables #1 and #2 that are in the same block or ¼ of a mile from the subject and are improved with three-story buildings of masonry or frame construction with 6,178 and 6,000 square feet of building area, respectively. Each building is smaller than the subject building suggesting upward adjustments for size may be appropriate. Board of review comparable #1 has one more bathroom than the subject, a full basement rather than a partial basement that the subject has, and central air conditioning, unlike the subject property, suggesting downward adjustments to the comparable for these differences would be proper. Board of review comparable #2 has a slab foundation unlike the subject's partial

basement indicating an upward adjustment for this difference would be proper. Conversely, board of review comparable #2 has a garage, unlike the subject, suggesting a downward adjustment for this difference would be suitable. These two comparables have improvement assessments of \$73,120 and \$70,860 or \$11.84 and \$11.81 per square foot of building area, respectively. The subject's improvement assessment of \$76,750 or \$11.76 per square foot of building area falls above the total improvement assessments but below the assessments on a per square foot basis as established by the best comparables in this record. The subject's overall higher improvement assessment is justified given the property's larger building size. Based on this record 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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