FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Elizabeth Park LTD Partnership
DOCKET NO.: 24-26621.001-R-1
PARCEL NO.: 17-21-318-013-0000

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:	$8,880
IMPR.:	$28,920
TOTAL:	$37,800

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 one-story multi-family building of masonry exterior construction that contains 2,066 square feet of building area. The building is approximately 147 years old. Features of the property include a full basement finished with an apartment and two bathrooms. The property has a 2,400 square foot 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 composed of class 2-11 properties improved with two-story multi-family buildings of masonry exterior construction that range in size from 2,019 to 2,904 square feet of building area. The buildings are from 103 to 138 years old. Three comparables have full basements, and

two comparables have crawl space foundations. Three comparables have a 1-car or 2-car garage. Each property has 2 or 3½ bathrooms. The comparables have the same neighborhood code as the subject property and are located from 1.25 to 2.62 miles from the subject property. These properties have improvement assessments ranging from $20,236 to $31,438 or from $10.07 to $10.94 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to $22,024.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $60,676 and an improvement assessment of $51,796.

The board of review asserted that the appellant's attorney failed to account for a second improvement located on the subject property composed of a class 2-03 property, a one-story residence, with 1,431 square feet of living area. The board of review also asserted that the subject's class 2-11 improvement has an assessed value of $18.62 per square foot of building area which is supported by the comparables.

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 one-story or two-story multi-family buildings of masonry or frame construction that range in size from 1,296 to 2,208 square feet of building area and are from 17 to 137 years old. One comparable has a full basement with an apartment, one comparable has a crawl space foundation, and two comparables have slab foundations. Two comparables have central air conditioning, two comparables have either a 2-car or 2.5-car garage, and the comparables have either 2 or 2½ bathrooms. The comparables have the same classification code as the subject and are located ¼ of a mile from the subject property. The comparables have improvement assessments ranging from $27,120 to $46,032 or from $18.76 to $20.93 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 first issue before the Board is to determine the description of the improvements located on the subject's parcel that contains 2,400 square feet of land area. Both the appellant and the board of review agree the subject has a class 2-11 one-story building of masonry construction with 2,066 square feet of building area. The board of review, however, also asserted the subject has an additional class 2-03 one-story residence with 1,431 square feet of living space. The Board finds the board of review presented no documentation to support this statement such as copies of the subject's property record card or property characteristics sheets describing the improvements. Both the appellant and the board of review submitted copies of photographs of the subject property depicting one building, undermining the board of review's statement that the subject has

two improvements. Additionally, the Board finds if the two buildings existed on the subject site as described by the board of review they would have a combined footprint of 3,497 square feet, which exceeds the size of the subject site, further undermining the board of review's assertion the subject has a second improvement. Therefore, based on this record, the Board finds that the subject property is improved with a class 2-11 property improved with a one-story building with 2,066 square feet building area with an improvement assessment of $51,796 or $25.07 per square foot of building area.[1]

The parties submitted information on nine equity comparables with the same classification code and neighborhood code as the subject property. The comparables have varying degrees of similarity to the subject in style, age, size and features. The Board gives less weight to board of review comparables #2 and #4 due to differences from the subject in age being approximately 130 and 120 years newer than the subject building, respectively. The seven remaining comparables are similar to the subject in age and have improvement assessments ranging from $20,326 to $33,020 or from $10.07 to $20.93 per square foot of building area. The subject's improvement assessment of $51,796 or $25.07 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 justified.

[1] Pursuant to section 1910.90(i) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.90(i)) the Board takes notice the subject property was the subject matter of appeals before the Board for the 2021 and 2022 tax years under Docket Nos. 21-29963.001-R-1 and 22-59116.001-R-1 in which decisions were issued reducing the subject's total assessment to $35,000 based on agreements of the parties. In each appeal the appellant submitted an appraisal describing the subject as being improved with one building, albeit the appraiser indicated the property is improved with a two-story building with a gross building area of 2,487 square feet containing two apartments each with 1,033 square feet of living area. The appraisal did not indicate the existence of a second improvement on the subject site.

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

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