



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

APPELLANT: 1750 W. Augusta LLC
DOCKET NO.: 24-29013.001-R-1
PARCEL NO.: 17-06-417-029-0000

The parties of record before the Property Tax Appeal Board (PTAB) are 1750 W. Augusta LLC, the appellant, by attorney Michael R. O'Malley, of Schmidt Salzman & Moran, Ltd. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, PTAB hereby finds **No Change** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

LAND: \$23,386
IMPR.: \$83,095
TOTAL: \$106,481

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision 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 4,320 square feet, three-story building of masonry construction perched on a 2,688 square feet lot in Chicago, West Chicago Township, Cook County. The 127-year-old, class 2-11 property per the Cook County Real Property Assessment Classification Ordinance included seven bathrooms, a full basement, no air conditioning, and a two-car garage. The appellant elected to forego a hearing on the petition.

The appellant contends assessment inequity as the basis of the appeal, arguing that the assessment should be reduced to \$15.29 per improvement square foot. To show that the subject assessment is not uniform, the appellant proposed five class 2-11 properties in the subject's neighborhood as equity comparables. These suggested comparators had three or eight bathrooms, no garage to a 2.5-car garage, air conditioning in property #5 only, and a full basement. The appellant's selections

further ranged between 43 and 130 years in building age; 3,924 and 5,834 in living square footage; and \$14.33 and \$15.64 per improvement square foot in assessment.

The board of review responded that the subject improvement was fairly assessed at \$83,095, or \$19.23 per living square foot in its “Notes on Appeal.” In defense of the \$106,481 total subject assessment, the county board of review offered information about four masonry properties within a quarter mile of the subject as assessment benchmarks. The board of review’s preferred comparables all featured six or eight bathrooms, air conditioning except in property #4, and a full or partial basement. These improvements were 118 to 162 years old; 4,039 to 4,640 square feet in area; and \$20.19 to \$25.73 per living square foot in assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. The Illinois Constitution requires real estate taxes “be levied uniformly by valuation ascertained as the General Assembly shall provide by law.” Ill. Const., art. IX, § 4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). This uniformity provision of the Illinois Constitution does not mandate absolute equality in taxation, however; instead, a reasonable degree of uniformity in the taxing authority’s assessments suffices. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When a property tax appeal is based on unequal treatment in the assessment, appellants must prove assessment inequity by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof required for a criminal conviction. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). Proof of unequal treatment in the assessment process should consist of documentation for the year in question of similarly situated properties of compelling proximity to, and with a lack of distinguishing characteristics from, the subject property. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant did not satisfy this burden of proof.

As the properties in evidence most similar to the subject improvement in size, board of review comparables #1, #3, and #4 comprise the best evidence of assessment equity. Board of review comparable #1 contained less living area and an inferior basement relative to the subject, but compensated for the difference with an extra full bathroom and air conditioning. Similarly, board of review comparable #3 included slightly more living square feet, an extra bathroom, and air conditioning, which offset the comparator’s lack of a garage. Finally, board of review comparable #4 lacked air conditioning like the subject and mitigated its one fewer bathroom and lack of a garage with more living space, resulting in a \$20.19 to \$25.73 per improvement square foot equitable range. As the subject’s \$19.23 per improvement square foot assessment lands inside this range, PTAB finds the appellant did not produce the requisite evidence to justify a reduction in the subject assessment.

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: _____

September 15, 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 9-125 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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