FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jacksongeorge LLC
DOCKET NO.: 24-32547.001-R-1 through 24-32547.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Jacksongeorge 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, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
24-32547.001-R-1	14-29-125-037-0000	110,725	82,892	$193,617
24-32547.002-R-1	14-29-125-038-0000	54,460	66,500	$120,960

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 has three improvements[1] on two parcels. Improvement #1 consists of a 2-story, mixed-use building of frame exterior construction with 5,347 square feet of building area and is approximately 132 years old. Features include a slab foundation and central air conditioning.[2] Improvement #2 is a 2-story, multi-family building of frame exterior construction with 2,357 square feet of gross building area, was built in 1893, and is approximately 131 years

[1] Improvements #1, #2, and #3 are classified class 2-12, class 2-11, and class 2-12 properties, respectively, under the Cook County Real Property Assessment Classification Ordinance. Improvements #1 and #2 are situated on the parcel #037 and Improvement #3 is situated on the parcel #038.
[2] The best description for Improvement #1, which was unrefuted by the appellant, was gleaned from the evidence presented by the board of review.

old.[3] Features include a slab foundation. Improvement #3 is a mixed-use building with 5,541 square feet of building area.[4] The property has a combined 8,881 square foot site and is located in Chicago, Lake View Township, Cook County.

The appellant contends assessment inequity concerning the three improvements as the basis of the appeal. In support of the Improvement #1 inequity argument, the appellant submitted information, including property characteristic sheets, on four equity comparables located within the subject's assessment neighborhood. The Board finds comparables #2 and #3 to be the same property. The comparables are improved with 2-story or 3-story, class 2-12 mixed-use buildings of frame or masonry exterior construction ranging in size from 4,290 to 6,250 square feet of building area . The buildings range in age from 98 to 158 years old. Each comparable has a full basement. Two comparables each have central air conditioning. Two comparables each have a 2-car or a 3.5-car garage. The comparables have improvement assessments ranging from $46,608 to $61,875 or from $7.64 to $11.07 per square foot of building area.

In support of the Improvement #2 inequity argument, the appellant submitted property search details and a chart in the brief containing five equity comparables located in the subject's assessment neighborhood. The comparables are identified as class 2-11 buildings of frame, masonry, or frame and masonry ranging in size from 1,888 to 2,796 square feet of gross building area. The buildings range from 106 to 134 years old. Each comparable has a full basement with finished area. Four comparables each have a 2-car garage. The comparables have improvement assessments ranging from $22,502 to $38,000 or from $10.79 to $13.82 per square foot of gross building area.

In support of the Improvement #3 inequity argument, the appellant submitted property search details and a chart in the brief containing five equity comparables located in the subject's assessment neighborhood. The comparables are identified as class 2-12 buildings ranging in size from 4,969 to 6,600 square feet of building area and have improvement assessments ranging from $46,608 to $75,500 or from $7.64 to $11.44 per square foot of building area.

Based on this evidence, the appellant requested a total reduced improvement assessment of $141,903 for the three improvements with reduced amounts for Improvement #1 of $52,935 or $9.90 per square foot of building area, for Improvement #2 of $29,957 or $12.71 per square foot of gross building, and for Improvement #3 of $59,011 or $10.65 per square foot of building area.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the 2024 tax year final decision disclosing the total assessment for the two parcels of $330,271. The subject property has a combined improvement assessment of $165,086. The appellant reports that Improvement #1 has an improvement assessment of $64,645 or $12.09 per square foot of building area, Improvement #2 has an improvement assessment of $33,941 or $14.40 per square foot of gross building area, and Improvement #3 has an improvement

[3] The best description of Improvement #2 was gleaned from the property characteristic printout presented by the board of review which was unrefuted by the appellant.
[4] The appellant provided limited information for Improvement #3 in the supplemental table found in the appellant's brief.

assessment of $66,500 or $12.00 per square foot of building area, which were unrefuted by the board of review.

The board of review disclosed the presence of three improvements on the subject's two parcels. In support of its contention of the correct assessment for Improvement #1, the board of review submitted information on four comparables, one of which was located within the subject's assessment neighborhood. The comparables are improved with 3-story, class 2-12 buildings of masonry or frame and masonry exterior construction that range in size from 4,646 to 7,059 square feet of building area. The buildings are from 6 to 144 years old. One comparable has a partial basement and three comparables each have a slab foundation. Each comparable has central air conditioning. One comparable has two fireplaces. Three comparables each have a 2-car or a 3-car garage. The comparables have improvement assessments ranging from $66,500 to $172,531 or from $12.00 to $24.44 per square foot of building area.

The board of review did not provide any evidence in support of its contention of the correct assessments for Improvements #2 and #3, but did provide a property characteristic printout for Improvement #2.

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). Based on the evidence in this record, the Board finds a reduction in the improvement assessments for Improvements #1 and #2 are warranted and no reduction for Improvement #3 is warranted.

The parties submitted a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board for Improvement #1. The Board has given reduced weight to the appellant's comparables #4 and #5, as well as the board of review comparables, due to differences when compared to the subject in design, age, size, central air conditioning, and/or garage amenity.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 and #2/3 which are relatively similar to the subject in location, design/class, age, size, and features. The two most similar comparables have improvement assessments of $46,608 and $61,875 or $7.64 and $9.90 per square foot of building area. Improvement #1 has an improvement assessment of $64,645 or $12.09 per square foot of building area which falls above the two best comparables in this record and appears to be excessive. After considering adjustments to the two best comparables for differences when compared to the subject, the Board finds a reduction in the improvement assessment for Improvement #1, commensurate with the appellant's request, is justified.

For Improvement #2, the appellant submitted five equity comparables for the Board's consideration, as the board of review failed to provide any suggested comparables. The appellant's comparables are relatively similar to the subject in location, age, and size with varying degrees of similarity in foundation type, garage amenity, and other features. Each comparable has a finished full basement and four comparables each have a garage amenity, both features the subject lacks, suggesting appropriate downward adjustments would be necessary to make them more equivalent to the subject. The comparables have improvement assessments ranging from $22,502 to $38,000 or from $10.79 to $13.82 per square foot of gross building area. Improvement #2 has an improvement assessment of $33,941 or $14.40 per square foot of gross building area which falls within the range established by the appellant's comparables on an overall basis but above the range on a per square foot basis. After consideration of Improvement #2's inferior features when compared to the comparables and the required adjustments to these comparables for the differences from Improvement #2, the Board finds a reduction in the improvement assessment for Improvement #2, commensurate with the appellant's request, is justified.

For Improvement #3, the appellant submitted five equity comparables for the Board's consideration, as the board of review failed to provide any suggested comparables. However, the Board finds neither party submitted property details for Improvement #3 such as design, age, and other features, which are required by the Board to conduct a complete and meaningful analysis of the similarities and differences of these comparables to Improvement #3. Therefore, the Board finds a reduction in the improvement assessment for Improvement #3 is not justified.

Based on the equity evidence in this record, the Board finds Improvements #1, #2, and #3 have improvement assessments of $52,935 (Reduction), $29,957 (Reduction), and $66,500 (No Change), respectively.

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: November 17, 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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