



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

APPELLANT: Francisco RK LLC  
DOCKET NO.: 21-33263.001-R-1  
PARCEL NO.: 13-25-305-042-0000

The parties of record before the Property Tax Appeal Board are Francisco RK LLC, the appellant, by attorney David R. Bass, of Field and Goldberg, LLC 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:** \$17,980  
**IMPR.:** \$63,733  
**TOTAL:** \$81,713

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 2021 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 2-story 2-unit apartment building of masonry exterior construction with 2,799 square feet of building area. The building is approximately 120 years old. Features include a basement, central air conditioning, and a 2-car garage. The property has a 3,596 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on February 1, 2019 for a price of \$758,000. The appellant completed Section IV of the appeal petition disclosing the parties to the sale were not related; the property sold using a realtor and was listed on the Multiple Listing Service and online for 18 days; and the sale was not due to foreclosure or by

contract for deed. In support of the sale, the appellant submitted copies of a settlement statement indicating payment of realtors' commissions, a Trustee's Deed, a Commitment for Title Insurance, and a listing sheet. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" and evidence on May 16, 2023 disclosing the total assessment for the subject of \$81,713. The subject's assessment reflects a market value of \$817,130 or \$291.94 per square foot of building area, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted the Board's prescribed grid analysis form containing information on three comparable sales located 0.25 of a mile from the subject. The parcels range in size from 3,150 to 7,500 square feet of land area and are improved with 2-story, class 2-11 buildings of masonry exterior construction ranging in size from 2,278 to 2,970 square feet of building area. The buildings are 120 or 127 years old. The board of review reported the subject is in poor condition whereas the comparables are in average or average/renovated condition. Each comparable has a basement, one of which has finished area. One comparable has central air conditioning and a fireplace, and two comparables each have a 1-car or a 2-car garage. The comparables sold in December 2021 for prices ranging from \$775,000 to \$1,150,000 or from \$326.92 to \$387.21 per square foot of building area, including land. Based on this evidence the board of review requested the subject's assessment be sustained.

In written rebuttal, the appellant argued the board of review did not present documentation of its comparable sales under Section 1910.65(c)(4) of the Board's procedural rules, after the burden shifted to the board of review to support the subject's assessment with substantive evidence under Section 1910.63(c).

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

As an initial matter, the Board rejects the appellant's argument that the board of review's use of the Board's prescribed grid analysis form for its comparable sales is insufficient as "substantive, documentary evidence" required under Section 1910.63(c) of the Board's procedural rules. The Board finds Section 1910.80 of the Board's procedural rules requires parties to use the forms prescribed by the Board. Consistent with Section 1910.80, the Board has issued forms for boards of review that include a grid analysis to be used to present information on comparable sales. Pursuant to Standing Order No. 2 issued by the Board, all parties are required to present their comparables in the Board's prescribed grid analysis form for all matters filed after February 28, 2023. The board of review's evidence, including the grid analysis, was filed after February 28,

2023 and the use of the Board's prescribed grid analysis form for its comparables was required. Moreover, the Board finds the appellant did not refute any of the features of the comparables or the sales data presented by the board of review in written rebuttal.

The appellant presented evidence of a February 2019 sale of the subject and the board of review presented three comparable sales in support of their respective positions before the Board. The Board gave little weight to the subject's sale due to the fact the sale did not occur proximate in time to the assessment date at issue. The Board gives less weight to the board of review's comparable #2, due to substantial differences from the subject in building size and basement finish.

The Board finds the best evidence of market value in the record to be the board of review's comparables #1 and #3, which sold proximate in time to the assessment date and are more similar to the subject in building size, age, location, and some features, although one comparable has a much larger site than the subject, one comparable lacks central air conditioning and a garage that are features of the subject, and both comparables are in average condition compared to the subject's poor condition, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables sold for prices of \$850,000 and \$1,150,000 or \$326.92 and \$387.21 per square foot of building area, including land, respectively. The subject's assessment reflects a market value of \$817,130 or \$291.94 per square foot of building area, including land, which is below the two best comparable sales in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is reflective of market value 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: \_\_\_\_\_

May 20, 2025



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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