FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: 1301 Rosedale LLC
DOCKET NO.: 21-42369.001-R-1
PARCEL NO.: 14-05-310-016-0000

The parties of record before the Property Tax Appeal Board are 1301 Rosedale LLC, the appellant(s), by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; 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:	$34,392
IMPR.:	$50,608
TOTAL:	$85,000

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 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 is improved with a three-story, single-family dwelling of frame and masonry construction, built approximately 113 years ago. The improvement contains 3,203 square feet of living area and includes a partial finished basement and a detached two-car garage. The dwelling consists of three bedrooms and two and one-half bathrooms. The property also features an unfinished basement of approximately 1,200 square feet and a deck. The parcel contains approximately 4,299 square feet of land located in the City of Chicago, within Lake View Township, Cook County. The subject is classified as Class 2-06 residential property under the Cook County Real Property Assessment Classification Ordinance. The appellant reports that the property is not owner-occupied.

The appellant challenges the assessment on the basis of overvaluation, assessment inequity, and a contention of law.

In support of the overvaluation claim, the appellant submitted an appraisal prepared by Charles Walsh, Certified Residential Real Estate Appraiser. The appraiser stated that the intended use of the appraisal is for tax assessment analysis and to estimate market value for purposes of establishing an equitable assessed valuation for ad valorem taxation. A complete interior and exterior inspection of the subject property was performed on October 12, 2022.

Using the sales comparison approach, the appraiser opined a retrospective market value of $850,000 as of January 1, 2021. Three recent arm's-length sales located near the subject were analyzed. These comparables were similar in age, design, size, and market appeal. Adjusted sale prices ranged from $810,285 to $865,455. The appraiser noted that only minimal adjustments were required, supporting the reliability of the analysis. Adjustments were applied for differences in site size, room count, basement finish, garage capacity, and other physical characteristics. The appraiser relied on MLS and assessor data to verify each transaction.

To support the inequity claim, the appellant submitted data for three Class 2-06 single-family equity comparables located within the same neighborhood code as the subject. Two comparable properties were within the same subarea and one was located within one-quarter mile of the subject. These comparables consist of frame or stucco-exterior dwellings ranging in age from 116 to 123 years and containing between 3,175 and 3,357 square feet of living area. Their improvement assessments ranged from $8.94 to $16.64 per square foot of living area.

The appellant also asserts a "Contention of Law," submitting a document titled "Brief in Support of Residential Appeal," which states that the grounds for appeal are unequal treatment in the assessment of the improvement. The appellant clarifies that the land assessment is not at issue. Although the appellant argues that the subject's improvement assessment is not uniform with similar properties, no evidence or argument was submitted that establishes a bona fide contention of law.

The Board of Review submitted its "Board of Review Notes on Appeal," reporting a total assessment of $101,110 for the subject property. This corresponds to an estimated market value of $1,011,100, or $315.67 per square foot of living area including land. The land assessment is $34,392, and the improvement assessment is $66,718, or $20.83 per square foot of living area.

In support of the assessment, the Board of Review submitted data for four equity comparables and four sales comparables. These properties exhibit varying degrees of similarity to the subject and are improved with two-story, single-family masonry dwellings. All comparable properties are located within the same neighborhood code as the subject, although their precise proximity to the subject property was not provided. The submitted comparable sales sold between 2020 and 2021, with sale prices ranging from $1,250,000 to $2,295,000, or from $345.03 to $814.41 per square foot of living area including land.

A hearing was scheduled in this matter; however, prior to the hearing, the parties jointly submitted a written request to waive the hearing and have the matter decided solely based on the evidence of record. The administrative law judge granted the request.

Conclusion of Law

The appellant asserts overvaluation, assessment inequity, and a contention of law as the bases for this appeal.

Contention of Law

With respect to the purported contention of law, the Board finds that the appellant failed to present a bona fide legal issue. Under 5 ILCS 100/10-15 and PTAB Rule §1910.69(a), the standard of proof in a contested case before the Property Tax Appeal Board is the preponderance of the evidence. PTAB rules further provide that the Board may consider appeals based on contentions of law; however, such contentions must relate directly to the correct assessment of the subject property and must be supported by a legal brief. 86 Ill. Admin. Code §1910.65(d). The rules also require that the contesting party provide substantive documentary evidence or legal argument sufficient to challenge the correctness of the assessment, and failure to do so may result in dismissal. 86 Ill. Admin. Code §1910.63(b).

Although the appellant submitted a "Brief in Support of Residential Appeal" asserting unequal treatment in the assessment of the improvement and stating that the land assessment is not at issue, the brief contains no legal argument or authority establishing a legitimate contention of law. Instead, its arguments address only uniformity of assessment. Accordingly, the Board concludes that no bona fide contention of law was raised.

Assessment Inequity

Turning to the assessment inequity claim, the appellant asserts that the subject property is inequitably assessed and offers this claim as a basis for reducing the assessment. When unequal treatment is alleged, the appellant must establish inequity by clear and convincing evidence. 86 Ill. Admin. Code §1910.63(e). Evidence of unequal treatment must include assessment documentation for no fewer than three comparable properties that are similar, proximate, and free from significant distinguishing characteristics relative to the subject. 86 Ill. Admin. Code §1910.65(b).

After careful review, the Board finds that the appellant has not met its burden. Although the appellant's comparables share the same classification, none are suitable for a credible, market-based equity analysis. Each contains material physical, functional, or documentary deficiencies that prevent reliable comparison to the subject. Two comparables lack key amenities—specifically a garage and air conditioning—and none contain a fireplace, unlike the subject. None share the subject's frame-and-masonry construction. Each comparable contains a full basement, while the subject has only a partial unfinished basement, and the appellant provided no basement finish details. The design of the properties also differs, as all appellant comparables are two-story dwellings, whereas the subject is three stories, a factor that materially affects improvement value and comparability.

The Board further notes that the appellant failed to submit property record cards for each equity comparable as required by Section V of the Residential Appeal Form. These documents would have supplied missing construction details, basement information, and other physical characteristics necessary to support reliable comparison. Taken collectively, inconsistencies in story height, garage presence, air conditioning, basement configuration, construction type, and missing documentation render the appellant's comparables unreliable for equity analysis.

Although the Board finds the Board of Review's submitted equity comparables similarly lacking substantial similarity to the subject, the appellant bears the burden of establishing inequity by clear and convincing evidence. Because the appellant did not meet this burden, and because the record does not establish a credible range of assessment equity, the Board finds that a reduction based on assessment inequity is not warranted.

Market Value

The appellant also asserts that the assessed valuation does not accurately reflect the subject's market value. When market value is the basis of the appeal, the appellant must establish the property's value by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. PTAB, 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). Proof of market value may consist of an appraisal, recent sale, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c).

After reviewing the evidence, the Board finds that the appellant met this burden. The appellant submitted a credible and well-supported appraisal concluding a market value of $850,000 as of January 1, 2021. The appraisal reflects a full interior and exterior inspection, employs recognized valuation methodology, and provides a detailed Sales Comparison Approach. The appraiser analyzed three verified sales located near the subject, applied reasoned adjustments for physical and economic differences, and reached a supported value conclusion of $850,000.

By contrast, the Board of Review did not submit probative market value evidence. Although it submitted four sales comparables, none were analyzed or adjusted for differences necessary to reliably estimate the subject's market value. The Board of Review submitted no appraisal, no income analysis, and no market-supported sales comparison study. Its submission consists solely of unadjusted equity information and price-per-square-foot data, which do not constitute credible evidence of market value and do not rebut the appellant's appraisal. Accordingly, the Board assigns minimal weight to the Board of Review's evidence.

The Board further notes that the subject's current assessed valuation of $101,110 corresponds to an implied market value of $1,011,100, based on the 10% level of assessment applicable to Class

2 property. This implied market value significantly exceeds the credible market value established by the appellant's appraisal.

Because the appellant has established market value by a preponderance of the evidence, the Board applies the 10% assessment level set forth in §1910.50(c)(2) and the Cook County Real Property Assessment Classification Ordinance and finds that a reduction in the assessment is warranted.

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: 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

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