



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: The City Homes on Roscoe Condo Assoc  
DOCKET NO.: 21-44168.001-R-1 through 21-44168.006-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are The City Homes on Roscoe Condo Assoc, the appellant(s), by attorney Ryan Schaefges, of the Law Office of Ryan Schaefges, P.C. in Wheeling; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-44168.001-R-1	14-19-314-046-1001	17,593	50,581	\$68,174
21-44168.002-R-1	14-19-314-046-1002	16,956	48,491	\$65,447
21-44168.003-R-1	14-19-314-046-1003	17,731	51,352	\$69,083
21-44168.004-R-1	14-19-314-046-1004	18,889	54,739	\$73,628
21-44168.005-R-1	14-19-314-046-1005	16,213	46,506	\$62,719
21-44168.006-R-1	14-19-314-046-1006	18,793	53,925	\$72,718

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 six condominium units with a combined 100% ownership interest in the common elements of a six-unit condominium building located in Chicago, Lake View Township, Cook County. The subject property is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant contends overvaluation as the basis of the appeal. In support of its market value argument, appellant prepared a brief contending four of the subject condominium units were purchased between the dates of January 2020 and February 2021 for prices ranging from

\$680,000 to \$692,500. Appellant included settlement statements containing sales information for three of the subject units with PINs ending in -1004, -1002, and -1003. For the subject unit with PIN ending in -1002 appellant submitted a real estate contract and MLS listing. Appellant also included an appraisal report for the subject unit ending in PIN -1002. The appraiser used the sale comparison approach based on six sales comparables. Three of the sales comparables are subject units. The appraiser determined the subject unit ending in PIN-1002 has a total market value of \$684,570. In addition, appellant submitted a copy of the board of review's decision reflecting the subject property's total valuation assessment for all six units at \$411,769. Based on this evidence, appellant requests a reduction in the subject property's total valuation assessment to \$397,495.

In support of its contention of the correct assessment, the board of review submitted its "Board of Review – Notes on Appeal" disclosing the subject property's total assessment of \$411,769. This assessment reflects a market value of \$4,117,690 using the Cook County Real Property Assessment Classification Ordinance for class 2 property of 10%. In its attached evidence, the board of review submits its assessment analysis using the sales of all six subject condominium units. The subject units sold for a total of \$4,126,000. After applying the percentage ownership interest in the common elements of the comparable sales of \$100%, the board of review calculated a total market value for the subject units of \$4,126,000.

This matter was set to proceed to hearing. Prior to hearing, the parties submitted a written request to waive hearing and for this matter be written on the evidence previously submitted. The administrative law judge granted the parties' request.

### **Conclusion of Law**

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 appellant *did not meet* this burden of proof and a reduction in the subject's assessment *is not* warranted.

A recent, arm's-length sale of the property is the best evidence of its fair market value. *People ex rel. Korzen v. Belt Ry. Co. of Chicago*, 37 Ill. 2d 158, 161 (1967); see also *Walsh v. Property Tax Appeal Board*, 181 Ill. 2d 228, 230 (1998).

The Board finds the best evidence of market value to be the sale of the subject property units submitted for all six units by the board of review and for four of the subject units by appellant. These sales occurred between 2019 and 2021 for prices ranging from \$680,000 and \$693,000. Based on this record the Board finds the subject property had a market value of \$4,126,000 as of January 1, 2021. Since market value has been determined, a reduction in the subject's assessment commensurate with the appellant's request is not appropriate.

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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:

January 20, 2026



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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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