



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

APPELLANT: RTB on Ravenswood, LLC
DOCKET NO.: 22-35999.001-R-1
PARCEL NO.: 14-07-421-013-0000

The parties of record before the Property Tax Appeal Board are RTB on Ravenswood, LLC, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook, 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: \$130,400
IMPR.: \$92,600
TOTAL: \$223,000

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 2022 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 three-story mixed use commercial and residential building of frame and masonry exterior construction with 11,539 square feet of gross building area which is approximately 105 years old. Features include a full finished basement and 8 full and 4 half-baths. The property has a 16,300 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-12 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables, where comparable #1 is located in the same neighborhood code as the subject. The remaining three comparables are located in varying neighborhoods and from .9 of a mile to 3.1-miles from the subject. The comparables consist of class 2-12 two-story or three-story buildings

of masonry exterior construction which range in age from 46 to 117 years old. The buildings range in size from 9,138 to 13,329 square feet of gross building area. Three comparables have full or partial basements and comparable #4 has a concrete slab foundation. The buildings have 2 or 4 full bathrooms and 1 or 2 half-baths, central air conditioning and comparable #1 has a four-car garage. The comparables have improvement assessments ranging from \$47,400 to \$80,725 or from \$4.67 to \$6.60 per square foot of gross building area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$67,503 or \$5.85 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$223,000. The subject property has an improvement assessment of \$92,600 or \$8.02 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables, where comparable #1 is located in the same neighborhood code as the subject and the remaining comparables are located in the subarea or within ¼ of a mile from the subject. Board of review comparable #2 is the same property as appellant's comparable #4. The comparables consist of class 2-12 two-story or three-story buildings of masonry exterior construction which range in age from 7 to 111 years old. The buildings range in size from 5,196 to 10,143 square feet of gross building area, two of which have partial unfinished basements and two of which have concrete slab foundations. The buildings have from 2 to 8 bathrooms and three buildings also have 1 or 2 half-baths as well. Two comparables have central air conditioning and comparable #4 has a four-car garage. The comparables have improvement assessments ranging from \$47,400 to \$76,560 or from \$4.67 to \$11.60 per square foot of gross building area.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer 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). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of seven suggested equity comparables, one of which was common to both parties, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #2, due to its location over three miles from the subject property. The Board has given reduced weight to board of review comparables #3 and #4, due to significantly smaller building sizes when compared to the subject which size differences range from approximately 42% and 55% in comparison to the subject

building of 11,539 square feet. In addition, board of review comparable #4 is 7 years old as compared to the subject that is 105 years old.

The Board finds on this limited record that the best evidence of assessment equity to be appellant's comparables #1, #3 and #4/board of review #2 and #1, which differ from the subject in several characteristics, but are the best comparables presented by the parties. Furthermore, only appellant's comparable #1 and board of review comparable #1 are located in the subject's neighborhood code, are three-story buildings, are 88 and 111 years old, respectively, in contrast to the subject that is 105 years old. However, each of these comparables differ in building size when compared to the subject that contains 11,539 square feet whereas these buildings contain 12,231 and 7,404 square feet, respectively. In light of the differences between these two comparables and the subject, many adjustments for differences are necessary. Nevertheless, the Board finds these four best comparables in the record have improvement assessments ranging from \$47,400 to \$80,725 or from \$4.67 to \$10.34 per square foot of gross building area. The subject's improvement assessment of \$92,600 or \$8.02 per square foot of gross building area falls above the best comparables in terms of overall improvement assessment but is within the range on a per-square-foot of gross building area basis which the Board finds to be logical given the subject's newer age and building size that is bracketed by these comparables.

Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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: _____

January 21, 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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