



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

APPELLANT: Valentine Bate
DOCKET NO.: 22-50976.001-R-1
PARCEL NO.: 20-34-309-027-0000

The parties of record before the Property Tax Appeal Board are Valentine Bate, the appellant, by attorney Eric Feldman, of Eric Feldman & Assoc. P.C. 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: \$5,379
IMPR.: \$16,621
TOTAL: \$22,000

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 1.5-story dwelling of masonry construction with 1,200 square feet of living area that is approximately 82 years old. The dwelling features 1½ baths, a full unfished basement, two fireplaces, and a 2-car garage. The property has a 5,379 square foot site and is located in Chicago, Hyde Park Township, Cook County. The subject is classified as a class 2-03 property¹ under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables located from .14 to .47 of a mile from the subject and within the same assessment neighborhood code as the subject property. The comparables are described as 1-story or 1.5-story, class 2-03 dwellings of masonry construction ranging in size from 1,119 to 1,248 square

¹ One-story residence, any age, with 1,000 to 1,800 square feet of living area.

feet of living area and ranging in age from 68 to 97 years old. Each comparable features 1, 1½, or 2 baths, a full unfinished basement, one or two fireplaces, and a 2-car or a 2.5-car garage. Two comparables have central air conditioning. The comparables have improvement assessments that range from \$7,170 to \$14,530 or from \$5.75 to \$11.64 per square foot of living area. The appellant also submitted a brief requesting a reduction to the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$22,000. The subject property has an improvement assessment of \$16,621 or \$13.85 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located within the same block or within ¼ of a mile from the subject and in the same assessment neighborhood code as the subject property. The comparables consist of 1.5-story, class 2-03 dwellings of masonry construction ranging in size from 1,070 to 1,323 square feet of living area and ranging in age from 81 to 85 years old. The comparables each feature from one to three full baths with comparable #1 having an additional half-bath. Each comparable also has a full basement, two with formal recreation rooms. Two comparables have central air conditioning; two comparables each have one fireplace; and three comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$16,782 to \$20,170 or from \$14.67 to \$16.91 per square foot of living area.

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 record contains a total of nine equity comparables. The Board gives less weight to appellant's comparables #3, #4, and #5 based on their substantially differing ages relative to the subject dwelling and/or having central air conditioning which is not a feature of the subject dwelling. The Board also gives less weight to board of review comparables #1, #2, and #4 based on having finished basements unlike the subject's unfinished basement, and/or having central air conditioning, a feature that the subject lacks. Furthermore, board of review comparable #1 lacks a garage, unlike the subject that features a 2-car garage.

On this record, the Board finds the best evidence of equity in assessment to be appellant's comparables #1 and #2, along with board of review comparable #3 which are overall most similar to the subject in location, age, dwelling size, unfinished basements, and features. The best comparables in the record have improvement assessments ranging from \$9,500 to \$18,654 or from \$7.90 to \$16.91 per square foot of living area. The subject's improvement assessment of \$16,621 or \$13.85 per square foot of living area falls within the range established by the best equity comparables in this record.

After considering adjustments to the comparables for any differences from the subject, the Board finds that the appellant did not establish by clear and convincing evidence that the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement is not 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: _____

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: August 19, 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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