



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

APPELLANT: Roscoe Property, LLC
DOCKET NO.: 23-56184.001-R-1
PARCEL NO.: 14-19-309-043-0000

The parties of record before the Property Tax Appeal Board are Roscoe Property, LLC, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd. 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 **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: \$37,500
IMPR.: \$32,377
TOTAL: \$69,877

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) challenging the assessment for the 2023 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 3,000 square foot parcel improved with two apartment buildings. Building #1 is a 3-story building of masonry exterior construction with 2,505 square feet of gross building area. This building is 116 years old and features a full basement and central air conditioning. Building #2 is a 2-story building of frame exterior construction with 1,500 square feet of gross building area. The building is 114 years old. This building features a full basement and central air conditioning. The property is located in Chicago, Lakeview Township, Cook County. Both buildings are classified as class 2-11 properties 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 within the subject's assessment neighborhood.¹ The comparables consist of 2-story and 3-story class 2-11 buildings of frame or masonry exterior construction ranging in size from 2,088 to 2,997 square feet of gross building area. The buildings range in age from 2 to 115 years old. Each building has a full basement and a 1-car or 2-car garage. Three comparables have central air conditioning. The comparables have improvement assessments ranging from \$10,950 to \$16,500 or from \$4.26 to \$6.44 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$94,000. The subject has a combined improvement assessment of \$56,500 or \$12.66 per square foot of gross building area. Building #1 has an improvement assessment of \$37,500 or \$14.97 per square foot of gross building area and Building #2 has an improvement assessment of \$19,000 or \$12.67 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 located within the subject's assessment neighborhood. The comparables consist of 2-story class 2-11 buildings of frame exterior construction ranging in size from 1,472 to 1,904 square feet of gross building area. The buildings are 128 to 143 years old. Each building has central air conditioning, two comparables each have a basement, two comparables each have crawl-space foundations, and three comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$23,501 to \$36,502 or from \$15.54 to \$24.80 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted a total of nine equity comparables to support their respective positions before the Property Tax Appeal Board. With respect to Building #1, the appellant submitted five comparables. The Board has given reduced weight to the appellant's comparables #3 and #4, which differ from the subject in building size. The Board finds the appellant's remaining comparables are similar to the subject in age and building size, with varying degrees of similarity in design and features. These comparables have improvement assessments that range from \$10,950 to \$16,500 or from \$4.26 to \$6.44 per square foot of gross building area. The

¹ The appellant also submitted a list of five comparables for Building #2. The Board finds these comparables were not presented on PTAB's prescribed forms as required by Section 1910.80 of the rules of the Property Tax Appeal Board. Therefore, pursuant to the Board's Standing Order No. 2, these additional comparable properties submitted by the appellant will receive no weight in the Board's analysis.

improvement assessment for Building #1 of \$37,500 or \$14.97 per square foot of gross building area is above the range established by the best comparables in this record.

With respect to Building #2, the board of review submitted four comparables. The Board has given reduced weight to the board of review's comparables #1 and #4, which differ from the subject in foundation and/or building size. The Board finds the board of review's remaining comparables are similar to the subject in age, building size, and some features. These comparables have improvement assessments of \$33,501 and \$36,502 or \$19.03 and \$24.80 per square foot of gross building area. The improvement assessment for Building #2 of \$19,000 or \$12.67 per square foot of gross building area is below the two best comparables in this record.

Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed for Building #1 and a reduction in the subject's assessment is 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 19, 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

AGENCY

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