



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

APPELLANT: California Funding LLC
DOCKET NO.: 20-28352.001-C-1 through 20-28352.002-C-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are California Funding LLC, the appellant(s), by attorney Jennifer Kanik, of the Law Offices of Terrence Kennedy Jr. 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-28352.001-C-1	16-01-424-044-0000	2,229	43,616	\$45,845
20-28352.002-C-1	16-01-424-046-0000	2,708	43,332	\$46,040

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 2020 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 10-year-old, first floor, commercial property of masonry construction divided into two, 2,726 square foot units. The property has a 12,743 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 5-97 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity and a contention of law as the basis of the appeal. In support of the inequity argument the appellant submitted information on five class 5-97 equity comparable properties, four of which are assigned different neighborhood codes than the subject. These properties are from one to 105 years in age; have from 2,564 to 5,000 square feet of building area; and have improvement assessments from \$4.97 to \$19.97 per square foot of building area. Based on this evidence the appellant is seeking a reduction in the subject's assessment.

The appellant did not submit a brief in support to the contention of law argument.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$125,563. Though the county board of review indicated it attached an addendum for two Property Identification Numbers (PINs), it submitted a total assessment for both PIN's combined. The board of review did not submit any other evidence.

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 Board finds the best evidence of assessment equity to be appellant's comparable #1, #2, #3, #4, and #5. The board of review did not submit any suggested comparable properties. Although appellant's comparables #1, #2, #3, #4, and #5 have different neighborhood codes than the subject and two of these comparables are significantly older than the subject, these comparables represent the best comparables suggested by the parties. These comparables had improvement assessments from \$4.97 to \$19.97 per square foot of building area. Due to differences between the subject and comparables the Board finds that correct assessment for the subject should be at the top end of the range of comparables. Accordingly, the Board finds that the appellant did meet the burden of proof by clear and convincing evidence of assessment inequity. Based on this record 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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