



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

APPELLANT: Medident LLC  
DOCKET NO.: 20-31613.001-C-1  
PARCEL NO.: 08-12-405-040-0000

The parties of record before the Property Tax Appeal Board are Medident 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 **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:** \$13,668  
**IMPR.:** \$34,925  
**TOTAL:** \$48,593

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 a one-story, 65-year-old, commercial building of masonry construction with 3,175 square feet of building area. The property has a 3,645<sup>1</sup> square foot site and is located in Mt. Prospect, Elk Grove Township, Cook County. The subject is classified as a class 5-17 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant indicates contention of law, overvaluation, and assessment inequity as the bases of the appeal. In support of the argument on assessment equity the appellant submitted information on six class 5-17 equity comparable properties for which the appellant did not disclose proximity to the subject. The suggested comparable properties were 46 to 63 years old; had from 2,413 to

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<sup>1</sup> Appellant submits that the property site is 3,210 square feet. The Board finds that this difference is immaterial to this appeal.

4,440 square feet of building area; and had improvement assessments from \$2.43 to \$12.99 per square foot of building area.

The attorney for the appellant submitted a letter claiming that the property has a land square footage error in which the assessor claims the property land size is 3,645 square feet while the appellant claims it is 3,210 square feet. Appellant relates that this error is the result of a consolidation of various lots. Based on this claim the appellant requested recognition that the property land be corrected to 3,210 square feet.

Included in this letter is the appellant's claim that the subject property is vacant and uninhabitable and had been for all of the 2020 lien year. Appellant further relates that due to Covid the property would remain vacant for all of 2020. The appellant then presents an attorney developed income capitalization computation involving potential gross income, vacancy, and a capitalization rate in which the appellant requests relief. The appellant included photos of the vacant interior of the subject property as well as gas and electric bills for the subject.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$66,250. The subject property has an improvement assessment of \$52,582 or \$16.38 per square foot of living area. The board of review did not submit any further evidence.

### **Conclusion of Law**

The taxpayer indicated contention of law as a basis of this appeal. No legal brief was included in the record. This basis was not considered by the Board.

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

The appellant submitted documentation showing the income of the subject property and an attorney developed market analysis based on this actual income. The Board gives the appellant's argument no weight. In Springfield Marine Bank v. Property Tax Appeal Board, 44 Ill.2d 428 (1970), the court stated:

[I]t is the value of the "tract or lot of real property" which is assessed, rather than the value of the interest presently held. . . [R]ental income may of course be a relevant factor. However, it cannot be the controlling factor, particularly where it is admittedly misleading as to the fair cash value of the property involved. . . [E]arning capacity is properly regarded as the most significant element in arriving at "fair cash value".

Many factors may prevent a property owner from realizing an income from property that accurately reflects its true earning capacity; but it is the capacity for earning income, rather than the income actually derived, which reflects "fair cash value" for taxation purposes. Id. at 431.

Actual expenses and income can be useful when shown that they are reflective of the market. Although the appellant's attorney made this argument, the appellant did not demonstrate through an expert in real estate valuation that the subject's actual income and expenses are reflective of the market. To demonstrate or estimate the subject's market value using income, one must establish, through the use of market data, the market rent, vacancy and collection losses, and expenses to arrive at a net operating income reflective of the market and the property's capacity for earning income. The appellant did not provide such evidence and, therefore, the Board gives this argument no weight and finds that a reduction based on overvaluation is not warranted.

The taxpayer also 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 meet this burden of proof and a reduction in the subject's assessment is warranted.

The appellant relates that the subject property was purchased in 2018. There is no evidence to support what condition the subject property was in when it was purchased or if the improvement had been rented or inhabited at the time. In their Commercial Appeal form the appellant indicated that one of the bases of the appeal was assessment inequity. Evidence submitted by the appellant as to the consolidation of lots or establishment of new PIN's prior to the lien year at issue have no relevance to the argument of assessment equity of the subject improvement. The appellant did not provide any evidence of inequitable assessment of the land. As to assessment equity, the appellant submitted six equity comparable properties. The Board finds the best evidence of assessment equity to be appellant's comparables #1, #2, #3, #4, #5, and #6. Appellant's comparables were similar to the subject in property class, age, and size. These comparable properties were similar to the subject and had improvement assessments that ranged from \$2.43 to \$12.99 per square foot of building area. The subject's improvement assessment of \$16.38 per square foot of living area falls above the range established by the best comparable properties in this record. Based on this record the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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:

April 21, 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Medident LLC, by attorney:  
Jennifer Kanik  
Law Offices of Terrence Kennedy Jr.  
180 North LaSalle Street  
Suite #2650  
Chicago, IL 60601

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602