



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Chicago South Investments, LLC  
DOCKET NO.: 20-48410.001-R-1  
PARCEL NO.: 25-21-314-012-0000

The parties of record before the Property Tax Appeal Board are Chicago South Investments, LLC, the appellant(s), by attorney Edwin M. Wittenstein, of Worsek & Vihon LLP 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:** \$2,046  
**IMPR.:** \$2,970  
**TOTAL:** \$5,016

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 single-family dwelling of frame construction with 950 square feet of living area. The dwelling is approximately 93 years old. Features of the home include a full unfinished basement and a two-car garage. The property has an approximately 3,720 square foot site located in Chicago, Lake Township, Cook County. The subject is classified as a class 2-02 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on a claim of overvaluation, specifically supported by a recent sale of the subject property. In support of this argument, the appellant submitted a master statement and provided responses in Section IV of the Residential Appeal form. According to the submitted documentation, the subject property was purchased in November 2017 for a sale price of \$28,000.

The appellant indicated in Section IV that the property was sold by the owner; however, the settlement statement identifies the seller as Secured Equity Financial, suggesting the transaction involved a financial institution. The appellant further represented that the sale was not between family members or related corporate entities, that the property was listed for sale through a multiple listing service (MLS), and that a licensed realtor was involved in the transaction. The appellant disclosed that the property was advertised for 123 days in the open market prior to the sale. Appellant did not respond to the question regarding whether the subject property was involved in a foreclosure action, nor did they submit a listing data sheet or listing history to substantiate the marketing and exposure of the property. Based on their evidence and arguments, the appellant requested a reduction in the subject's total assessment to \$2,800.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$5,016. The subject property has an improvement assessment of \$2,970 or \$3.13 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on three equity comparable properties with varying degrees of similarities to the subject that are located within a block of the subject. The comparable properties are one-story class 2-08 single-family dwellings that range in size from 795 to 964 square feet of living area. The homes range in age from 94 to 99 years and each have either a one or a two-car garage. The comparable properties have improvement assessments ranging from \$3.26 to \$.83 per square foot of living 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 appellant presented evidence indicating that the subject property was sold in 2017 for a purchase price of \$28,000. In support of this claim, the appellant completed Section IV – Recent Sale Data of the Property Tax Appeal Board's Residential Appeal Form and the closing statement for the sale, disclosing that the parties to the transaction were not related, that the sale involved the services of a licensed realtor, and that the property had been publicly advertised for sale.

However, the appellant did not clarify whether the sale resulted from a foreclosure action and identified the seller as Secured Equity Financial, a financial institution. This raises concerns regarding the nature of the transaction and whether it qualifies as an arm's-length sale for purposes of determining market value.

Furthermore, the record lacks a listing data sheet or listing history that could have substantiated the marketing of the subject property, including its exposure time on the open market and the conditions of the sale, such as whether it was associated with a foreclosure action.

Additionally, the Board finds that the sale of the subject property in 2017 is too remote in time from the January 1, 2020, lien date relevant to this appeal to be considered reliable evidence of the subject's current market value.

Pursuant to 86 Ill. Admin. Code § 1910.65(c)(4) and consistent with the holding in Calumet Transfer LLC v. Illinois Property Tax Appeal Board, 401 Ill. App. 3d 652 (1st Dist. 2010), the Board may consider market value evidence, such as sales of comparable properties, to determine whether the subject was sold at fair cash value. In this case, the appellant did not submit any such comparable sales evidence.

Ultimately, the burden rests with the appellant to demonstrate overvaluation by a preponderance of the evidence. Based solely on the subject's 2017 sale and in the absence of supporting comparable sales, the Board finds that the appellant has failed to satisfy this burden.

Accordingly, a reduction in the subject's assessment 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.



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Chairman



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Member



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Member



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Member



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Member

DISSENTING: \_\_\_\_\_

C E R T I F I C A T I O N

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 20, 2026

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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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