



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

APPELLANT: Diversey Rockwell, LLC
DOCKET NO.: 21-32580.001-R-1
PARCEL NO.: 13-25-227-033-0000

The parties of record before the Property Tax Appeal Board are Diversey Rockwell, LLC, the appellant, by attorney Abby L. Strauss, of Schiller Law 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: \$31,930
IMPR.: \$50,070
TOTAL: \$82,000

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 2021 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 two-story mixed-use building of masonry exterior construction with 7,557 square feet of gross building area. The building is 106 years old and features a concrete slab foundation and central air conditioning. The property has a 6,386 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-12 property 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 four equity comparables. The comparables consist of class 2-12 buildings of masonry exterior construction ranging in size from 7,602 to 7,900 square feet of gross building area. The buildings range in age from 91 to 129 years old. Each building has a full or partial basement, one comparable has central air conditioning, and two comparables each have a four-car garage. The comparables

have improvement assessments ranging from \$20,204 to \$29,052 or from \$2.56 to \$3.74 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment of \$23,880 or \$3.16 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$82,000. The subject property has an improvement assessment of \$50,070 or \$6.63 per square foot of gross building area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables located within the subject's assessment neighborhood, one of which is within .25 of a mile of the subject. The comparables consist of two-story or three-story class 2-12 buildings of masonry exterior construction ranging in size from 4,935 to 6,728 square feet of gross building area. The buildings are each 110 years old. Each comparable has a full or partial basement and one building has central air conditioning and a two-car garage. The comparables have improvement assessments ranging from \$44,965 to \$88,800 or from \$6.92 to \$13.20 per square foot of gross building area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant argued that the board of review comparables differ from the subject in building size.

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 parties submitted a total of seven equity comparables to support their respective positions before the Property Tax Appeal Board. The Board finds none of the comparables presented by the parties are truly similar to the subject due to their basement foundations in contrast to the subject's concrete slab foundation. Nevertheless, the Board has given reduced weight to the appellant's comparables #1 and #2, which feature a garage unlike the subject. The Board also gives less weight to board of review comparable #3, which differs from the subject in building size and includes a garage.

The Board finds the best evidence of assessment equity to be appellant's comparables #3 and #4 along with board of review comparables #1 and #2, which are somewhat similar to the subject in age, building size, and some features. These comparables have improvement assessments that range from \$28,438 to \$88,800 or from \$3.73 to \$13.20 per square foot of gross building area. The subject's improvement assessment of \$50,070 or \$6.63 per square foot of gross building area falls within the range established by the 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 did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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 20, 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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