



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

APPELLANT: Commercial Acquisitions, LLC
DOCKET NO.: 21-38807.001-R-1 through 21-38807.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Commercial Acquisitions, LLC, the appellant, by attorney Robert Rosenfeld, attorney-at-law of Robert H. Rosenfeld & Associates, LLC in Northbrook, 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
21-38807.001-R-1	19-35-402-033-0000	2,500	9,996	\$12,496
21-38807.002-R-1	19-35-402-050-0000	1,250	7,854	\$9,104

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 two parcels with a combined land area of 4,687 square feet that are improved with a two-story dwelling of masonry exterior construction with 1,534 square feet of living area. The dwelling is approximately 75 years old. Features of the home include a partial unfinished basement, 1½ bathrooms, and a 2-car garage.¹ The property is located in Chicago, Lake Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

¹ In Section III of the appeal the appellant indicated the subject property did not have central air conditioning, however, in the Section V grid analysis of the appeal the appellant indicated the subject has central air conditioning. The board of review described the subject property as not having central air conditioning, which was not refuted by the appellant in rebuttal.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales composed of class 2-05 properties of masonry exterior construction that range in size from 1,338 to 1,530 square feet of living area. The homes range in age from 73 to 81 years old. Each property has a full or partial basement, one to two bathrooms and a 1-car or a 2-car garage. Comparable #1 has one fireplace.² The comparables have sites ranging in size from 4,375 to 5,000 square feet of land area. The comparables have the same assessment neighborhood code as the subject property. The sales occurred from April to December 2020 for prices ranging from \$190,000 to \$208,000 or from \$135.33 to \$142.00 per square foot of living area, including land. The appellant requested the subject's combined total assessment be reduced to \$21,252.

The appellant submitted a copy of the final decision issued by the board of review disclosing the two parcels had a combined total assessment of \$58,262. The subject's assessment reflects a market value of \$582,620 or \$379.80 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" referencing only one of the two parcels under appeal, parcel number 19-35-402-033-0000. In support of its contention of the correct assessment the board of review submitted information on four comparable sales consisting of class 2-05 properties improved with two-story dwellings of stucco, masonry, or frame exterior construction that range in size from 1,683 to 2,140 square feet of living area. The homes range in age from 95 to 138 years old. Each property has a full basement with one having finished area, and 2 or 2½ bathrooms. Three comparables have central air conditioning. Two comparables have one fireplace and either a 1½-car or a 2-car garage. The comparables have sites ranging in size from 4,216 to 12,656 square feet of land area. The comparables have different assessment neighborhood codes than the subject property. The sales occurred in August or December 2021 for prices ranging from \$600,000 to \$610,000 or from \$285.05 to \$356.51 per square foot of living area, including land.

Conclusion of Law

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 met this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the appellant's comparable sales which are more similar to the subject property in location, dwelling size, age, and/or land area than are the board of review comparable sales. These comparables sold for prices ranging from \$190,000 to \$208,000 or from \$135.33 to \$142.00 per square foot of living area, including land. The subject's combined total assessment reflects a market value of \$582,620 or \$379.80 per square

² In the Section V grid analysis, the appellant described the subject and the comparables as having central air conditioning.

foot of living area, including land, which is above the range established by the best comparable sales in this record. Based on this evidence the Board finds 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: _____

February 18, 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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