



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

APPELLANT: Perfecta Farm Properties, LLC
DOCKET NO.: 22-22033.001-R-1
PARCEL NO.: 06-15-202-020-0000

The parties of record before the Property Tax Appeal Board are Perfecta Farm Properties, LLC, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd. 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: \$73,426
IMPR.: \$47,957
TOTAL: \$121,383

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 2022 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 dwellings. Dwelling #1 is a multi-level home of frame and masonry exterior construction with 2,325 square feet of living area. The dwelling is 32 years old and feature a basement with finished area, central air conditioning, a fireplace, and a 3-car garage.¹ Dwelling #2 is a multi-level dwelling with 1,569 square feet of living area. The property has an 809,258 square foot site and is located in Elgin, Hanover Township, Cook County. Dwelling #1 is classified as class 2-04 property and Dwelling #2 is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on both unequal treatment in the assessment process as well as overvaluation concerning the subject property. In support of the overvaluation argument, the

¹ The Board finds the board of review's grid, which was not refuted by the appellant in rebuttal, to be the best evidence of the subject's age and features.

appellant submitted evidence disclosing the subject property was purchased on January 14, 2020 for a price of \$1,100,000. The appellant reported that the seller was the John S. and Julie A. Runzel Living Trust, the parties to the transaction were not related, and the property sold through a realtor. The appellant also indicated the property was not advertised for sale. In support of the sale, the appellant submitted copies of a Real Info Property Detail Report and a screenshot from the Cook County Recorder's website confirming the sale date and sale price.

In support of the inequity argument, the appellant submitted five equity comparables located within the subject's assessment neighborhood. The comparables consist of 1-story dwellings of frame exterior construction ranging in size from 2,098 to 2,264 square feet of living area. The homes range in age from 38 to 44 years old. Each dwelling has central air conditioning and a 2-car garage. Two comparables each have a basement and three comparables each have concrete slab foundations. Two comparables each have a fireplace. The comparables have improvement assessments ranging from \$20,360 to \$23,760 or from \$9.55 to \$10.98 per square foot of living area.

Based on this evidence, the appellant requested a reduction in the subject's total assessment to reflect the purchase price and a reduced improvement assessment of \$36,574 or \$9.39 per square foot of combined living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$121,383. The subject property has a total improvement assessment of \$47,957 or \$12.32 per square foot of combined living area. The board of review disclosed that Dwelling #1 has an improvement assessment of \$27,750 or \$11.94 per square foot of living area and Dwelling #2 has an improvement assessment of \$20,207 or \$12.88 per square foot of living area. The subject's assessment reflects a market value of \$1,213,830 or \$311.72 per square foot of combined living area, land included, when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

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. The comparables consist of 1-story or 1.5-story dwellings of frame or masonry exterior construction ranging in size from 1,865 to 1,983 square feet of living area. The homes range from 34 to 39 years old. Each dwelling has a 2-car garage. Two comparables have central air conditioning and a basement, and one comparable has a crawl-space foundation. Two comparables are reported to have "other improvements," which were not further described. The parcels range in size from 6,433 to 11,301 square feet of land area. The comparables have improvement assessments ranging from \$23,280 to \$23,959 or from \$12.03 to \$12.85 per square foot of living area. Comparable #1 sold in July 2021 for a price of \$321,000 or \$168.59 per square foot of living area, including land. The board of review confirmed the sale price of the subject. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends, in part, 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 parties submitted evidence of the subject's recent sale and one comparable sale to support their respective positions before the Property Tax Appeal Board. The appellant disclosed the purchase of the subject property in January 2020 for a price of \$1,100,000, which was confirmed by the board of review. The appellant submitted copies of the property detail report and Recorder's website. However, the Board finds that the property was not advertised for sale or exposed on the open market, as disclosed by the appellant, and therefore the sale lacks the elements of an arm's length transaction. The Board gives little weight to the one comparable sale presented by the board of review, which differs from the subject in design, foundation, dwelling size, site size, and lacks central air conditioning, a feature of the subject. This comparable also does not feature two dwellings like the subject. Based on this record, the Board finds a reduction in the subject's assessment is not justified on overvaluation grounds.

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

The parties submitted a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board finds the parties' comparables are not truly similar to the subject, which has a combined living area of 3,894 square feet. Nevertheless, the Board has given reduced weight to the appellant's comparables #1, #2, and #5, as well as board of review comparable #1, which differ from the subject in foundation.

The Board finds the best evidence of assessment equity to be the appellant's comparables #3 and #4 along with board of review comparables #2 and #3, which have varying degrees of similarity to the subject in design, dwelling size, and features. These comparables have improvement assessments that range from \$22,396 to \$23,959 or from \$10.49 to \$12.85 per square foot of living area. The subject's total improvement assessment of \$47,957 or \$12.32 per square foot of combined living area falls within the range established by the best comparables in this record on a per-square-foot basis. Dwelling #1 has an improvement assessment of \$27,750 or \$11.94 per square foot of living area, which is slightly above the range overall and within the range on a per-square-foot basis. The Board finds Dwelling #1's higher improvement assessment logical given the larger dwelling. Dwelling #2 has an improvement assessment of \$20,207 or \$12.88 per square foot of living area, which is within the range overall and slightly above the range on a per-square-foot basis. The Board finds Dwelling #2's higher improvement assessment per square foot to be logical given the smaller dwelling and considering economies of scale. 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: _____

November 25, 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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