



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

APPELLANT: Eloise Landa
DOCKET NO.: 22-39807.001-R-1
PARCEL NO.: 17-05-116-021-0000

The parties of record before the Property Tax Appeal Board are Eloise Landa, the appellant(s), by attorney Daniel J. Farley, 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 **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:

LAND: \$23,670
IMPR.: \$136,411
TOTAL: \$160,081

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 buildings. One building an approximately 131-year-old three-story dwelling of masonry construction with 2,205 square feet of living area. Features of the home include a full basement, central air conditioning, and three bathrooms. The second adjacent building is an approximately 131-year-old three-story dwelling with 6,060 square feet of living area of masonry construction. Features of the building include three bathrooms, central air conditioning, and a full basement. The property has a 3,960 square foot site and is located in Chicago, West Chicago Township, Cook County. The subjects are classified as class 2-11 properties under the Cook County Real Property Assessment Classification Ordinance.

Before discussing comparables submitted by the party, the Board would like to clarify the nature of this property, as there is some dispute in the record. The appellant submitted a small brief that the Board found most persuasive in describing the property subject to appeal. In its brief, the

appellant clarified that his parcel contains two properties, a 2,205 square foot apartment building and another 6,060 square foot building. The appellant submitted a set of comparables for each building to be considered. While not fully specified, upon review, the board of review only submitted comparables for the 2,205 square foot building.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on ten equity comparables. First, the Board will discuss the comparables for the 2,205 square foot building. The comparables are located 0.1 to 0.6 miles away from the subject property. The comparables are 122- to 133-year-old two- or three-story class 2-11 residences with masonry construction. The comparables have between 5,029 and 5,871 square feet of living area and have improvement assessments between \$10.11 and \$18.10 per square foot of living area.

Now, the Board will discuss the comparables submitted by the appellant for the second building, the 6,060 square foot building. The comparables are located 0.3 to 1.0 mile(s) away from the subject property. The comparables are 17- to 145-year-old two-story class 2-11 residences with masonry construction. The comparables have between 2,640 and 3,300 square feet of living area and have improvement assessments between \$16.27 and \$19.19 per square foot of living area. The appellant is requesting a total assessment for both properties of \$122,520.

The county board of review submitted its "Board of Review Notes on Appeal. The total overall assessment for both properties per the board of review decision letter is \$235,639. In support of its contention of the correct assessment for the 2,205 square foot property, the board of review submitted information on four equity comparables. These comparables are located 0.25 miles away from, on the same block as the subject property. The comparables are 128- to 143-year-old two-story residences with frame or masonry construction. The comparables have between 2,418 and 2,710 square feet of living area and have improvement assessments between \$24.80 and 28.10 per square foot. The board of review is requesting that the current assessment be confirmed.

Conclusion of Law

The taxpayer asserts assessment inequity as the basis of the appeal. The Illinois Constitution requires that real estate taxes, "be levied uniformly by valuation ascertained as the General Assembly shall provide by law." Ill. Const. art. IX, §4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). This uniformity provision of the Illinois Constitution does not require absolute equality in taxation, however, and it is sufficient if the taxing authority achieves a reasonable degree of uniformity. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

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); Walsh, 181 Ill. 2d at 234 (1998). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof needed for a conviction of a crime. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not fewer 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 Board finds the best evidence of assessment equity to be appellant's comparables #1, #4 and #5 and board of review comparable #1 and #4 for the 2,205 square foot building and appellant's comparables #3, #4, and #5 for the 6,060 square foot building, as the board of review did not submit comparables for that building. As for comparables that are not best evidence, appellant's comparables #2 and #3 for the 2,205 square foot building are larger than the subject. Board of review's comparables #2 and #3 are larger properties that do not have basements that property has a basement. For that property, the improvement assessment of the 2,205 square foot property of \$23.81 per square foot is within the range of the improvement assessment per square foot of the best comparables of \$17.76 to \$25.63. The appellant did not show by clear and convincing evidence that there should be a reduction for the 2,205 square foot property. However, for the 6,060 square foot property, the appellant did show by clear and convincing evidence that there should be a reduction since the board of review did not provide any comparables for that property. Nonetheless, the Board found appellant's comparables #1 and #2 for that building not persuasive since they are newer properties by over 100 years. 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

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 17, 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

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