



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

APPELLANT: Cerberus SFR Holdings, L.P.
DOCKET NO.: 22-56455.001-R-1
PARCEL NO.: 28-11-319-013-0000

The parties of record before the Property Tax Appeal Board are Cerberus SFR Holdings, L.P., 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: \$ 1,584
IMPR.: \$ 9,087
TOTAL: \$10,671

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) 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 a 1.5-story dwelling of frame and masonry construction that was built in 1939 and is approximately 83 years old. The dwelling contains 1,017 square feet of living area and is situated on a 5,280 square foot site. The dwelling features a full unfinished basement, central air conditioning, and a one-car garage. The subject property is a Class 2-03 residential property under the Cook County Real Property Assessment Classification Ordinance. The subject property is located in Bremen Township, Cook County.

The appellant contends assessment inequity as the basis of the appeal. The appellant did not challenge the subject's land assessment. In support of the inequity claim, the appellant submitted four suggested comparables that are located in the same assessment neighborhood code as the subject and from 1.02 to 1.33 miles from the subject. The comparables consist of two-story dwellings of frame and masonry construction that are 57 to 87 years old. The dwellings range in

size from 1,247 to 1,499 square feet of living area. One comparable has a full unfinished basement and three comparables have a crawl space foundation. One comparable has central air conditioning and two comparables have a one and one-half car garage. The comparables have improvement assessments ranging from \$7,403 to \$10,166 or from \$5.94 to \$6.85 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's final assessment of \$10,671. The subject property has an improvement assessment of \$9,087 or \$8.94 per square foot of living area.

In support of the subject's assessment, the board of review submitted four suggested assessment comparables located in the same assessment neighborhood code as the subject. Three comparables were described as located in the "subarea" and one comparable is located ¼ of a mile from the subject. The comparables consist of 1.5-story dwellings of masonry construction that are 58 to 94 years old. The dwellings contain 1,447 to 1,747 square feet of living area. Two comparables have an unfinished basement and two comparables have a crawl space foundation. Three comparable have central air conditioning and three comparables have a two or two and one-half car garage. The comparables have improvement assessments ranging from \$10,003 to \$11,798 or from \$5.73 to \$8.15 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 appellant argued the property was inequitable inequitably assessed. 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 no reduction in the subject's assessment is warranted.

The parties submitted eight suggested assessment comparables for the Board's consideration. The Board finds neither of the parties' comparables are particularly similar to the subject. For example, the comparables contained in this record are from 18% to 42% larger in dwelling size than the subject; six comparables are considerably newer in age than the subject; five comparables have inferior crawl space foundations in comparison to the subject, and three comparables lack a garage when compared to the subject. The Board finds the comparables submitted by both parties have improvement assessments ranging from \$7,403 to \$11,798 or from \$5.94 to \$8.15 per square foot of living area. The subject property has an improvement assessment of \$9,087 or \$8.94 per square foot of living area, which falls at the lower end of the range established by the most similar equity comparables on total basis and above the range on a per square foot basis.

Accepted real estate valuation theory provides, all other factors being equal, as the size of a property increases, its per unit value decreases. Likewise, as the size of a property decreases, its

per unit value increases. Based on this analysis, the Board finds the subject's higher per square foot improvement assessment is well justified given its smaller size. Based on this record, the Board finds the appellant failed to demonstrate the subject property was inequitably assessed by clear and convincing evidence and no reduction the subject's improvement assessment is 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.



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

AGENCY

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