



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

APPELLANT: C. Squared Investments, LLC  
DOCKET NO.: 23-23300.001-R-1  
PARCEL NO.: 15-35-309-029-0000

The parties of record before the Property Tax Appeal Board (PTAB) are C. Squared Investments, 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, PTAB hereby finds **A Reduction** in the Cook County Board of Review's assessment of the property is justified. The correct assessed valuation of the property is:

**LAND:** \$2,691  
**IMPR.:** \$21,059  
**TOTAL:** \$23,750

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a Cook County Board of Review decision pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2023 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 2,244 square feet, two-story brick structure on a 2,990 square feet parcel in Brookfield, Riverside Township, Cook County. The 102-year-old residence contained two bathrooms, central air conditioning, and a full basement. The property was sold in September 2021 for \$237,500 by First Midwest Bank after advertising the property for sale on multiple listing services. The transaction was not between related parties or pursuant to a foreclosure action or a contract for deed.

The appellant contends the \$26,000 subject assessment overvalues the subject property. The appellant supported the overvaluation argument with a copy of the sale contract indicating the subject sold in September 2021 for \$237,500 to borrower C Squared Investments LLC. The attached master statement corroborated the transaction details, though it appeared unsigned by the parties.

In its “Notes on Appeal,” the county board of review maintained that the subject was correctly assessed at \$26,000. To fortify this position, the board of review supplied details about four one- or two-story properties in different neighborhoods than the subject’s. The board of review did not, however, present any sales information. Instead, the county board of review argued the subject assessment was equitable because the assessed values “for the comps is the same or higher than the subject.”

The appellant rebutted the board of review’s submission, noting the uniformity argument was not only unpersuasive, but also failed to address the appellant’s basis for the petition: overvaluation.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in the Cook County Board of Review’s 2023 assessment of the subject. When a taxpayer bases a property tax appeal on overvaluation, 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 a recent sale or appraisal of the subject property, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant satisfied this burden of proof.

In this record, only the appellant presented evidence regarding the subject’s market value. The appellant attached to the petition a sale contract confirming that the subject sold in September 2021, fewer than two years before the 2023 assessment year, for \$237,500. The appellant then supplemented the contract with an unsigned settlement statement with the same transaction details. By contrast, the board of review submitted equity evidence and made no representations as to the subject property’s market value. As such, given the proximity of the purchase date to the assessment date, the credibility of the evidence supporting the purchase price, and the lack of evidence to the contrary, PTAB finds that the market valued the subject property around \$237,500. PTAB accordingly concludes the appellant showed overvaluation by a preponderance of the evidence and a reduction in the total subject assessment to \$23,750, commensurate with the indicated market value and the appellant’s request, 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



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:

April 21, 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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