



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

APPELLANT: CSS Capital LLC  
DOCKET NO.: 23-41388.001-R-1  
PARCEL NO.: 13-34-400-010-0000

The parties of record before the Property Tax Appeal Board are CSS Capital LLC, the appellant, by Brian P. Liston, attorney-at-law of the Law Offices of Liston & Tsantilis, 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:** \$7,623  
**IMPR.:** \$24,380  
**TOTAL:** \$32,003

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 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 is improved with a two-story building of masonry exterior construction containing 2,386 square feet of building area. The building is approximately 97 years old. Features of the property include a full basement, two bathrooms, and a 2-car garage. The property has a 3,810 square foot site located in Chicago, Jefferson Township, Cook County. The subject is a class 2-11 apartment building under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables composed of class 2-11 properties improved with two-story buildings of masonry or frame exterior construction that range in size from 2,088 to 2,512 square feet of building area. The buildings are 114 or 123 years old. Each property has a full basement, two or three full

bathrooms and a 2-car garage.<sup>1</sup> The comparables have the same assessment neighborhood code as the subject. These properties have improvement assessments ranging from \$16,250 to \$18,968 or from \$7.23 to \$7.78 per square foot of building area. The appellant requested the subject's improvement assessment be reduced to \$17,943.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$32,003. The subject property has an improvement assessment of \$24,380 or \$10.22 per square foot of building area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-11 properties improved with two-story buildings of masonry exterior construction that range in size from 1,704 to 2,496 square feet of building area. The buildings are from 95 to 103 years old. Each comparable has a full basement with one having finished area, two bathrooms and a 1-car, 1.5-car or 2-car garage. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$17,858 to \$26,750 or from \$10.28 to \$12.79 per square foot of building area.

### **Conclusion of Law**

The appellant 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 information on seven equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board finds the best comparables in the record to be board of review comparables #1, #2 and #3 that are most similar to the subject in age, size and exterior construction. These three comparables are also relatively similar to the subject in features and have improvement assessments ranging from \$24,668 to \$26,750 of from \$10.28 to \$12.79 per square foot of building area. The subject's improvement assessment of \$24,380 or \$10.22 per square foot of building area is below the best comparables in this record. The Board gives less weight to the appellant's comparables due to differences from the subject in age and two of the comparables differ from the subject in exterior construction. The Board gives less weight to board of review comparable #4 due to differences from the subject in building size. Based on this record 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.

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<sup>1</sup> The appellant submitted copies of the Cook County Assessor's Office property characteristic sheets for the subject and the comparables that indicated each property has a full basement with a recreation room.

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.



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Chairman



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Member



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Member

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Member

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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



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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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