FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Commercial Acquisitions, LLC
DOCKET NO.: 24-40828.001-R-1
PARCEL NO.: 19-35-338-044-0000

The parties of record before the Property Tax Appeal Board are Commercial Acquisitions, LLC, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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:	$3,175
IMPR.:	$13,825
TOTAL:	$17,000

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 2024 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 exterior construction with 1,114 square feet of living area. The dwelling was built in 1948 and is approximately 76 years old. Features include a crawl space foundation and a 2-car garage. The property has a 5,292 square foot site and is located in Chicago, Lake Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity regarding the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located within the subject's assessment neighborhood. The comparables are improved with 1-story or 1.5-story, class 2-03 homes of frame exterior construction ranging in size from 1,077 to 1,184 square feet of living area. The dwellings range in age from 67 to 76 years old. Three comparables each have a slab foundation and one comparable has a crawl space

foundation. Each comparable has a 1-car or a 2-car garage. The comparables have improvement assessments ranging from $11,310 to $13,825 or from $10.50 to $11.76 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $17,000. The subject property has an improvement assessment of $13,825 or $12.41 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located within the subject's assessment neighborhood. The comparables are improved with 1.5-story, class 2-03 of frame exterior construction ranging from 1,080 to 1,184 square feet of living area. The dwellings range in age from 75 to 77 years old. Two comparables each have a full basement, one comparable has a slab foundation, and one comparable has a crawl space foundation. One comparable has central air conditioning. Each comparable has a 2-car garage. The comparables have improvement assessments ranging from $14,825 to $15,825 or from $12.52 to $14.49 per square foot of living area. The board of review asserts the assessed values per square foot for the submitted comparables support the subject's assessed value as equitable.

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 record contains eight equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #3, and #4 which have a dissimilar 1-story design, in contrast to the subject's 1.5-story design. The Board also gives less weight to board of review comparables #2, #3, and #4 which have either a basement foundation or central air conditioning, both features the subject lacks.

The Board finds the best evidence of assessment equity to be the appellant's comparable #2 and board of review comparable #1 which each lack a basement foundations, like the subject, and are similar to the subject in location, design/class, age, dwelling size, and other features. The two best comparables have improvement assessments of $13,825 and $14,825 or $11.68 and $13.73 per square foot of living area. The subject's improvement assessment of $13,825 or $12.41 per square foot of living area is equal to the overall improvement assessment for the appellant's comparable #2 and is bracketed by the two best comparables in this record on a per square foot basis. Based on this record and after considering appropriate adjustments to the two 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:

C E R T I F I C A T I O N

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 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 9-215 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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