



2025 Annual Appeal Rules Meeting

March 13, 2025



COOK COUNTY
**ASSESSOR'S
OFFICE**

2025 Annual Appeal Rules Meeting

Presenters

Christina Lynch, Director of Legal

Gina Matthiesen, Senior Legal Counsel

Michael Piper, Chief Valuations Officer

Tatia Gibbons, Chief Legal Officer

Chatbox Experts

Brian Sibila, Director of Special Projects

Jerome Marconi, Senior Legal Counsel

Raymond Gottner, Director of Residential Valuations

Rosa Yuqui Aguaiza, Manager of Legal Services

Today's Presentation

Post Questions in the Chat Box

Relevant links and other information will be posted in the chat

Changes for 2025

Major & Minor Changes – Complete Reorganization, Appraisals, Comps, Land Valuation, Omitted Assessments, Property Location Changes, and more!

Valuation Policy Updates

Demolition and Qualification for Unimproved Real Estate, Properties Under Construction

Even More Valuation Data Online!

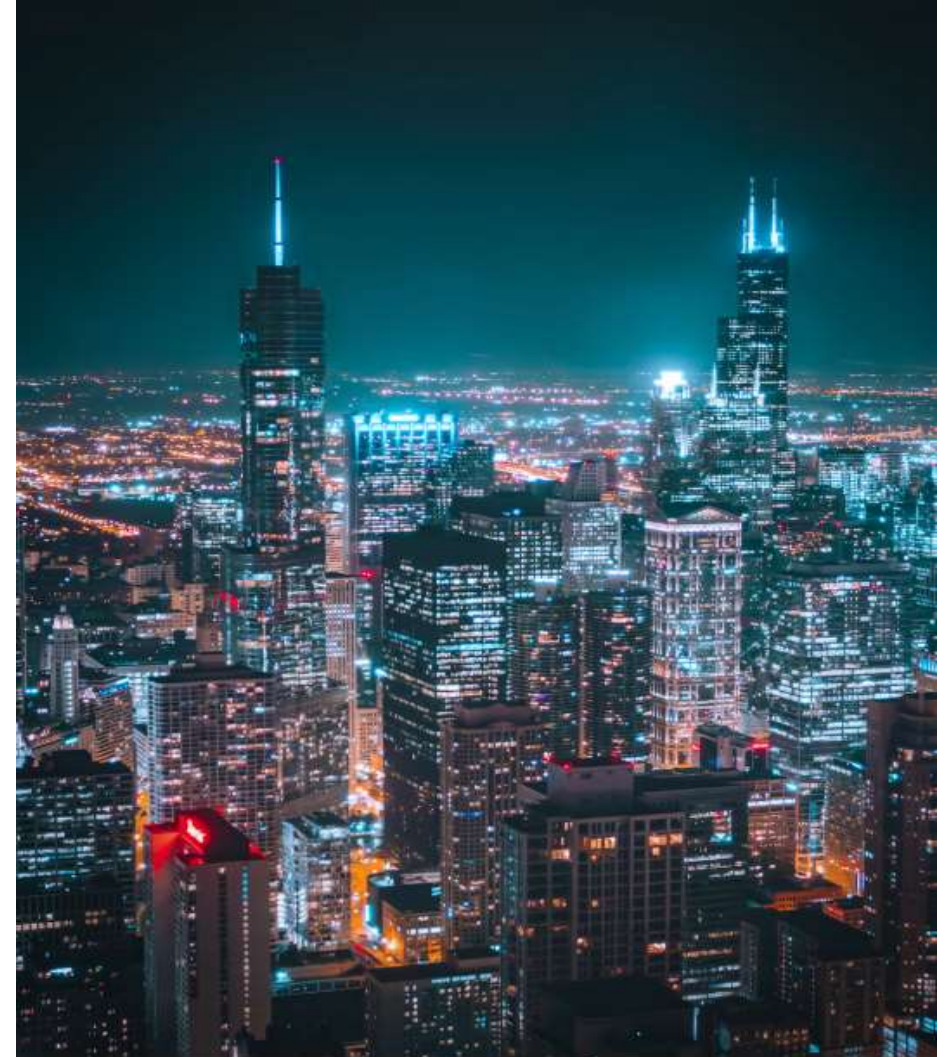
Valuation Reports, Reassessment Methodology Worksheets, Open Data Portal

Slides and Follow Up Information

The slides be posted on our website, along with the 2025 Appeal Rules & 2025 Appeal Guidelines

First Things First – What does the CCAO do?

- Setting fair and accurate values for the **1.9 million parcels** of real property in Cook County.
- Administers Property Tax Exemptions for all qualifying Cook County property owners.
- Administers developmental and other Incentives for real property in Cook County.
- Assists Cook County taxpayers with all of the above. We are here to help!
- www.cookcountyassessor.com

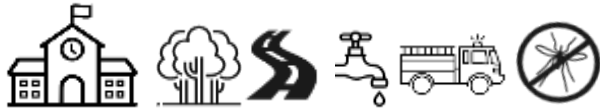


First Things First: Understand the Property Cycle

Visit: www.cookcountyassessor.com/cook-county-property-tax-system for more information

Property Tax Levies

are re-budgeted every year to help fund local public services, like schools and community health centers.



Taxing agencies conduct public hearings, publish their levy, and certify their levy to the Cook County Clerk.



Local Tax Rates

are calculated by the **Cook County Clerk**, dividing levies by Equalized Assessed Values.



Your Property Tax Bill

is issued and collected by the **Cook County Treasurer**, then distributed to taxing districts to fund services.

Property Tax Base



Cook County Assessor's Office

Revaluation and reassessment
Assessment appeals
Property tax incentives and exemptions



Cook County Ordinance

Transforms property values →
Assessed Values, based on property use



Cook County Board of Review

Assessment appeals
Finalizes the Assessed Values (AVs) used
for property taxation



Illinois Department of Revenue

Calculates Cook County's **Equalizer**. This
transforms AVs → Equalized AVs (EAVs).
Exemptions reduce EAVs.



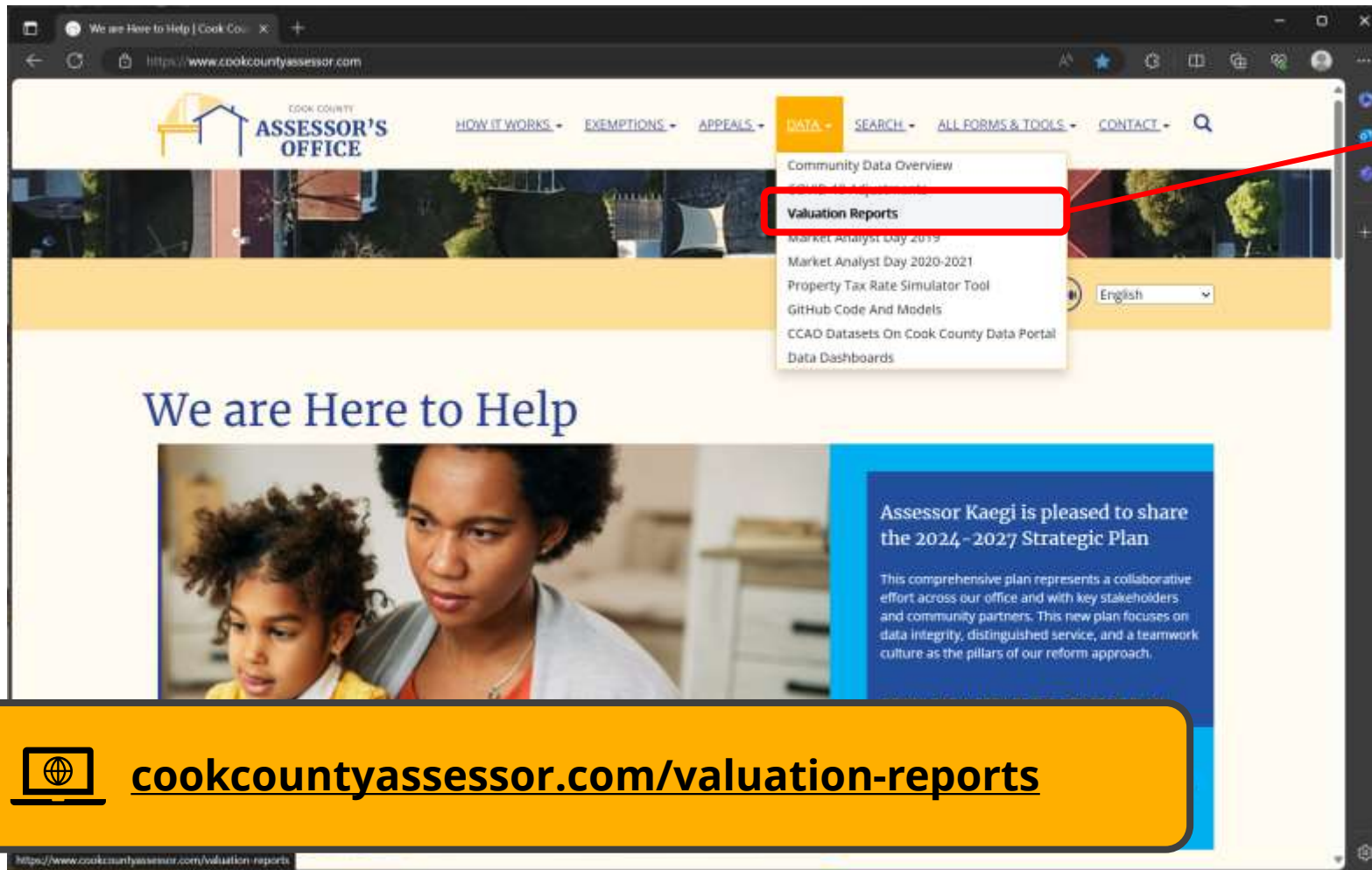
First Things First – Assessed Valuations

- In Illinois, County Assessors must assess real property at fair market value, but also uniformly.
- Therefore, Illinois County Assessors view the whole “forest” of properties in their county, rather than just any single “tree”.
- To achieve both uniformity and fair market value, the CCAO develops our mass appraisal values from actual market data, as do Assessors across the United States.
- Both the residential and commercial models are posted on our website.
- www.cookcountyassessor.com/valuation-reports



First Things First – Valuation Data Online

All the Township valuation models for commercial properties are located online here:



Community Data Overview

COVID-19 Adjustments

Valuation Reports

Market Analyst Day 2019

Market Analyst Day 2020-2021

Property Tax Rate Simulator Tool

GitHub Code And Models

CCAO Datasets On Cook County Data Portal

Data Dashboards

Click **Data** in the navigation menu. Then, click **Valuation Reports**. The valuation reports are organized by Township.



[cookcountyassessor.com/valuation-reports](https://www.cookcountyassessor.com/valuation-reports)

Publicly Available Assessor Data

The Assessor's Office publishes a wealth of data and datasets on its website, including:

1. Valuation Reports: for all properties (residential and non-residential), direct link here: [Learn about Reassessments | Cook County Assessor's Office](#)
2. Reassessment Methodology Worksheets: for income-producing properties
3. The Cook County Assessor's 2023 Open Data Refresh: part of the Cook County Open Data Portal, direct link here: [Assessor - 2023 Open Data Refresh | Cook County Open Data](#)
4. Assessor's "Public Access" Channel: offers more details for all properties (residential and non-residential) when you search by PIN or address.

2023 Open Data Refresh: The Datasets

The datasets on our open data portal include:

- Parcel Universe
- Single and Multi-Family Improvement Characteristics
- Parcel Sales
- Assessed Values
- Appeals
- Parcel Addresses
- Parcel Proximity
- Commercial Valuation Data
- Property Tax-Exempt Parcels
- Neighborhood Boundaries



First Things First – Appeals Overview Online

The CCAO provides an overview of the assessment appeal process online:

The screenshot displays the Cook County Assessor's Office website. At the top, there is a banner for "PROPERTY TAX SAVINGS" with a link to "APPLY ONLINE". Below this is the website header with the logo and navigation links: "HOW IT WORKS", "EXEMPTIONS", "APPEALS", "DATA", "SEARCH", and "ALL". The "APPEALS" menu is expanded, showing a list of options. The "Overview" option is highlighted with a red box. A larger red box highlights the "Overview" option in the expanded menu. Below the menu, there is a large blue banner that says "We are Here to Help". At the bottom, there is a yellow banner with a laptop icon and the URL cookcountyassessor.com/appeals.

PROPERTY TAX SAVINGS
The exemption application for tax year 2024 is now available. Learn more about exemptions and apply online today. [APPLY ONLINE](#)

COOK COUNTY
ASSESSOR'S OFFICE

HOW IT WORKS ▾ EXEMPTIONS ▾ **APPEALS ▾** DATA ▾ SEARCH ▾ ALL

- Overview
- Calendar & Deadlines
- File Online
- Find Comparable Properties
- Official Appeal Rules
- Residential Appeals
- Industrial/Commercial
- Vacant Land
- Not-For-Profit Appeals
- Apartment With 7+ Units
- Incentives & Special Properties
- Condo/Co-Ops
- Cap Rate Policy
- Omitted Assessment

We are Here to Help

cookcountyassessor.com/appeals

KEY POINTS regarding the appeals process

- Current year assessments are appealed; not property tax bills.
- Appeals are filed to request a correction to the current year assessed valuation; not the amount of the property tax bill.
- A change in assessed value does not necessarily equal a reduction in the property tax bill.
- The Assessor does not calculate, mail, or collect property tax bills.



2025 Appeal Rules – Major Reorganization

- We have completely reorganized the Appeal Rules to improve information flow, appearance, and navigation.
- Therefore, many rule numbers have changed, along with the location of familiar information.
- Thoroughly review the 2025 Appeal Rules, along with the 2025 Appeal Guidelines, prior to filing any 2025 assessment appeal.
- The 2025 Appeal Rules and 2025 Appeal Guidelines are posted on our website.
- www.cookcountyassessor.com/official-appeal-rules-cook-county-assessor

2025 Appeal Rules – Quick Tour

- **General Provisions – Preliminary Information for All Appeals**
- Rule 1 – Rules and Policies
- Rule 2 – Forms and Documentation – General Provisions
- Rule 3 – Property Inspection (“Field Check”) Requests
- Rule 4 – Homestead Exemptions

- As for Rule 4, it specifies that Homestead Applications and Assessment Appeals are in completely different filing worlds; please do not commingle the two as it will result in the delay of any homestead exemption application, which no one wants.

2025 Appeal Rules – Quick Tour

- **Filing Assessment Appeals, Representation, and Deadlines**
- Rule 5 – Appeal Filing General
- Rule 6 – Attorney and Agent Authorization
- Rule 7 – First Appeal is the Controlling Appeal
- Rule 8 – Attorney and Agent Substitutions
- Rule 9 – Anonymity Requirement
- Rule 10 – Appeal Deadlines
- Rule 11 – Miscellaneous Appeal Filing Rules - General

2025 Appeal Rules – Quick Tour

- **Evidence in Support of an Assessed Valuation Appeal**
- Rule 12 – Supporting Evidence for All Appeals
- Rule 13 – Purchase and Sale Arguments and Documentation
- Rule 14 – Appraisals
- Rule 15 – Equity Analysis/Sales Comparison Analysis/“Comps”
- Rule 16 – Income Producing Property
- Rule 17 – Condominiums & Townhomes, including Common Area
- Rule 18 – Land Valuation, Classification, and Demolition
- Rule 19 – Ongoing Construction
- Rule 20 – Vacancy (this rule has not moved!)

2025 Appeal Rules – Quick Tour

- **Rule 21: Class Change Requests**
- Class Changes within Class 2
- Class 5 to Class 2-12
- Class 5 to Class 3-18 (more on Class 3-18 changes later)
- Class 4 (Not for Profit)
- Other Class Changes for Non-Incentive Classes
- Class Changes to an Incentive Class
- AHSAP (Affordable Housing Special Assessment Program)
- LIHTC (Low Income Housing Tax Credit) Valuation Program

2025 Appeal Rules – Quick Tour

- **Rule 22: Omitted Assessments**
- More on omitted assessments later!

- **Rule 23: Property Tax Exempt Properties**
- These are properties owned by tax exempt entities, such as churches, municipalities, park districts, schools, etc.
- Not to be confused with the homestead exemptions, such as homeowners, senior, senior freeze, veterans, etc.

2025 Appeal Rules – Quick Tour

- **Correction of Factual Errors, & Certificates of Error**
- Rule 24: (Still) No Appeal Re-Reviews
- Rule 25: Corrections of Factual Errors – Methods
- Rule 26: Property Location Corrections
- Rule 27: Certificates of Error

WHEW – what a whirlwind tour!
Now, on to some specific updates...



Rule 14: Appraisals

- Must be credible under USPAP standards.
- Must include dated, color photographs of the subject property.
- Must include all PINs for the subject property, plus all PINs for properties used in the valuation analysis.
- Must be based on available and reasonable sales and market data, and not “cherry picked” to lower the valuation.

-AND-

- Filers must provide any other appraisal reports for the subject property which were prepared at any time within 2 years prior to the lien date (January 1) of the appeal year.

Rule 15: “Comps”

- Good comps are those which are those which are of similar size, class, characteristics, and location to the subject.
- Filers should refrain from “cherry picking” only those comps which are lower in value than the subject.
- Filers should use at least 3 comps – 5 comps are best. Include the PIN and color photograph for each comp used.
- If using sales comps, make sure that each sale is an arm’s length transaction at fair market value rather than a compulsory sale.
- Unless a property is truly unique, the CCAO is not overly concerned with swimming pools or sheds.
- The CCAO is not overly concerned with updates to kitchen or bathroom finishes.

Rule 15: “Comps” continued...

These are the seven most important factors in choosing residential comps:

1. **Proximity:** The CCAO analysts are looking for comps which are closest to the subject, rather than those which are the lowest in value.
2. **Square Footage:** It is best to choose comps which are similar in size to the subject.
3. **Age:** It is best to choose comps which are similar in age to the subject.
4. **Exterior Construction:** It is best to choose comps which are similar in exterior construction to the subject; pair “masonry” with “masonry”, “frame” with “frame, and so on.
5. **Basement:** It is best to choose comps which have similar types of basements to the subject – slab, crawl, unfinished, finished.
6. **Land Square Footage:** It is best to chose comps which have similar site size.
7. **Garage:** It is best to choose comps which have similar types of garages to the subject – attached, detached, number of vehicles.

Rule 15: “Comps” – visualizer

These properties are similar



These properties are not...



Rule 18: Land Valuation, Classification, and Demolition

Generally, the CCAO values land per square foot, at market value. However, there are some types of appeals for land valuation:

- Valuation of Land is incorrect (often, a “comps” argument for land)
- Land square footage is incorrect
- Farmland
- Excess/Unbuildable Land
- Unimproved Land due to Demolition – residential, commercial, and industrial

Note as to flood plain: The CCAO already incorporates FEMA Flood Plain Maps into its land valuations, so appeals based on this reason are generally unnecessary.

Rule 18: Land Square Footage

- The CCAO does not independently validate land square footage for any PIN.
- Rather, the CCAO will instead check to make sure that our records for land square footage match the County's records.
- If the CCAO's land square footage matches County records, then the CCAO cannot grant a reduction in land square footage.
- To determine whether there is a discrepancy between a tax parcel and ownership, the legal description on the deed should be compared to the tax map/tax parcel legal description. This may be done in the Clerk's Map Department. Please be prepared with a copy of the deed of the property. This may also be emailed to Clerk.Maps@cookcountyil.gov.
- Taxpayer may also need to provide a survey to resolve any land square footage discrepancies with the County.

Rule 18: Farmland

- If land qualifies for farmland assessment under the Property Tax Code, Section 1-60, it will be classed as 2-39.
- Class 2-39 is defined as non-equalized land under agricultural use, valued at farm pricing.
- The CCAO has recently updated its website to provide more guidance on farmland applications. Please review the website thoroughly prior to applying for farmland.
- www.cookcountyassessor.com/farms



Rule 18: Unimproved Land Due to Demolition

- Demolition Permit, showing the date of issuance.
- Evidence of payment for the demolition.
- Affidavit stating the date of the demolition.
- Dated color photographs, showing the property both before demolition and after demolition.
- Narrative providing information regarding the demolition with key dates.
- The valuation will be prorated from the date of the demolition, rather than valued as vacant land for the entire year of the demolition.



Updated CCAO Policy

Policy Governing Demolition and Qualification for Unimproved Real Estate (1-00 Class)

- Location: www.cookcountyassessor.com/demolition-and-unimproved-real-estate-valuation-policy
- General Summary: This policy addresses the demolition of industrial and commercial buildings, and when and how the property can be reclassified to vacant land (Class 1-00). Any resulting reclassification will reduce the level of assessment from 25% to 10%.
- Documents to submit in support of an appeal for Class 1-00 should include but are not limited to: affidavit of unimproved real estate, demolition permit, dated photographs of the property post-demolition, demolition invoice and payment receipt, appeal brief providing key information regarding the demolition with dates.

Rule 19: Ongoing Construction (NEW CCAO Policy!)

Policy Regarding Properties Under Construction

- Location: www.cookcountyassessor.com/commercial-properties-under-construction-valuation-policy
- General Summary: This policy explains the CCAO's approach to estimating the fair market value (FMV) of property that are under construction. Generally, the CCAO estimates the FMV on a monthly straight-line value-add model based on the "as complete" value of the property, rather than by granting vacancy or valuing as vacant land.
- Documents to submit in support of an appeal for overvaluation due to ongoing construction include but are not limited to: verified contractor's statement(s) detailing the total cost of construction, building permit(s), occupancy certificate(s), appeal brief explaining construction costs and timeline with specific dates.

Rule 21: Class Change Requests

Generally, the following types of documentation are required for most class change requests:

- Dated color photographs.
- Building Details – floor plans, surveys, appraisals – to show an accurate description of the building and its square footage.
- Documents which show the building's use – commercial, residential, mixed use. Leases and Rent Rolls are useful.
- Unit characteristics – both residential and commercial units – how many rooms, what is each room used for, square footage.
- Zoning – residential units should be zoned for residential use.

Rule 21: Changes to 3-18 Class

The major change to this Rule is the definition of Class 3-18 for mixed-use properties:

- All mixed-use commercial/residential buildings under 20,000 square feet of area with 7 units or more - or - mixed-use commercial/residential buildings with an area of 20,000 to 99,999 square feet where no more than 60% of the building is used for commercial purposes.
- For mixed use buildings which do not meet these parameters or those for class 2-12, the building will instead be subject to a split class of commercial (Class 5) and residential (Class 2 or 3).



Rule 21: Special Classes

Class 4 - Not for Profit Usage

- Please see the Class 4 eligibility bulletin, filing requirements, and the CCAO's Not-for-Profit Affidavit form at www.cookcountyassessor.com/not-profit.

Incentive Classes

- Please see information regarding incentive classes, including eligibility, application filing, and appeal filing www.cookcountyassessor.com/incentives-special-properties.

AHSAP (Affordable Housing Special Assessment Program) and LIHTC (Low Income Housing Tax Credit)

- Please see information regarding AHSAP and LIHTC eligibility, application, and appeal filing www.cookcountyassessor.com/affordable-housing.

Why AHSAP? Illustration of Incentive Tax Savings

- **TIER 1: 25% reduction in assessed value.** At least 15%-34% of dwelling units must be maintained as affordable units.
- **TIER 2: 35% reduction in assessed value.** At least 35% of dwelling units must be maintained as affordable units.
- **Low Affordable Community:** at least 20% of dwelling units must be maintained as affordable units.

**All applicants must meet an affordability level at or below 60% of the AMI (Area Median Income) and meet the required rent and income limits published by the IHDA (Illinois Housing Development Authority).*

Hypothetical AHSAP Savings: Tier 1

Apartment Building A: Tier 1 - 25% Reduction

\$3,000,000 market value

AHSAP Value = \$2,250,000 after the 25% reduction

Original Tax Bill = \$61,705

Adjusted AHSAP Tax Bill = \$46,279

Estimated Property Tax Savings = \$15,426

Estimates based on 10% LOA for multi-unit property

2022 State equalizer = 2.9237

2022 City tax rate = 7.035

Hypothetical AHSAP Savings: Tier 2

Apartment Building B: Tier 2 - 35% Reduction

\$5,000,000 market value

AHSAP Value = \$3,250,000 after the 35% reduction

Original Tax Bill = \$102,841

Adjusted AHSAP Tax Bill = \$66,847

Estimated Property Tax Savings = \$35,994

Estimates based on 10% LOA for multi-unit property

2022 State equalizer = 2.9237

2022 City tax rate = 7.035

Rule 22: Omitted Assessments

Section 9-260(a) of the Property Tax Code authorizes the Cook County Assessor to assess taxable property that was omitted from the tax roll:

After signing the affidavit, the county assessor shall have power, when directed by the board of appeals (until the first Monday in December 1998 and the board of review beginning the first Monday in December 1998 and thereafter), or on his or her own initiative, subject to the limitations of Sections 9-265 and 9-270, to assess properties which may have been omitted from assessments for the current year and not more than 3 years prior to the current year for which the property was liable to be taxed, and for which the tax has not been paid, but only on notice and an opportunity to be heard in the manner and form required by law, and shall enter the assessments upon the assessment books.



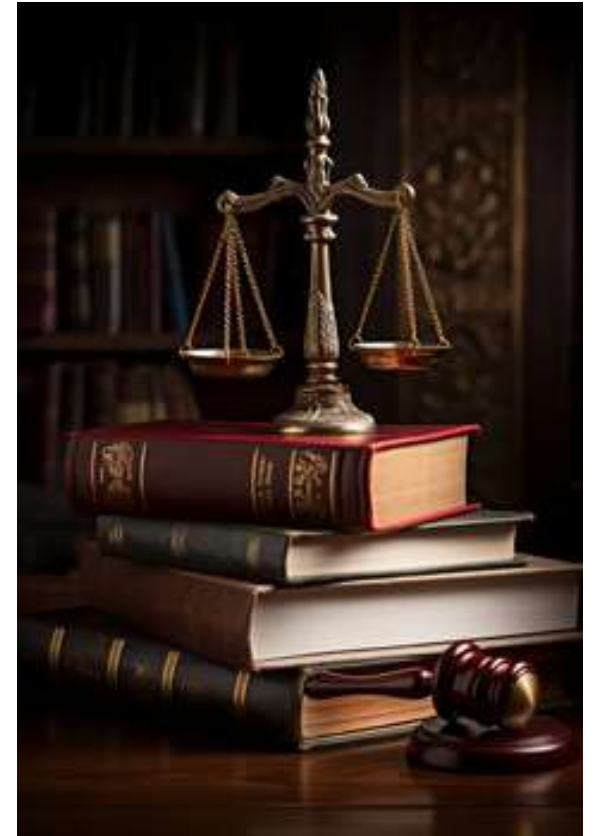
Rule 22: Omitted Assessments – Process

- Same evidence rules applicable to assessments in a current year apply to omitted assessments.
- Limited to three years prior to the current warrant year.
- Notices are mailed to the address for the taxpayer as discoverable through the public records (typically, the taxpayer “mail tax bills to” address shown on the most recent deed) and indicate the deadline to file your appeal.
- Must be appealed in the warrant year they are issued: after that, taxpayer must use the Certificate of Error process.
- Bona fide purchaser defense – actual and constructive notice.

Omitted Assessments – Bona Fide Purchaser

A common claim taxpayers make as a defense to the issuance of an omitted assessment is that they took title to property as a “bona fide purchaser” but a bona fide purchaser is defined as follows:

A charge for tax and interest for previous years, as provided in Sections 9-265 or 14-40, shall not be made against any property for years prior to the date of ownership of the person owning the property at the time the liability for the omitted tax was first ascertained. **Ownership as used in this section shall be held to refer to bona fide legal and equitable titles or interests acquired for value and without notice of the tax,** as may appear by deed, deed of trust, mortgage, certificate of purchase or sale, or other form of contract.



Omitted Assessments – Bona Fide Purchaser

A *bona fide* purchaser is one who purchases an interest for value and **without notice of the tax**.

Two Types of Notice:

- Actual – circumstances or facts known to a prospective purchaser
- Constructive – circumstances or facts of which a prospective purchaser is chargeable with knowledge, imposing upon such purchaser the *duty of inquiry*

Nearly all facts concerning a property during the course of a real estate transaction are public record – either available online or through a FOIA request.

❖ *Practice Pointer: Know the last few years' historical facts about the property you are or your client is purchasing!*

Omitted Property Tax Bills

When are omitted tax bills issued & due and payable?

- (1) A property tax bill for omitted assessments “shall be prepared and mailed” at first installment time. 35 ILCS 200/9-260(b).
- (2) The omitted property tax bill is not due, however, “until the date on which the second installment property tax bill...becomes due.” 35 ILCS 200/9-260(b).
- (3) Statutory delinquency interest applies to an omitted property tax bill as it does with a general assessment property tax bill. Prior to TY2023, 1.5% per month and TY2023 and after, 0.75% per month. 35 ILCS 200/9-260(b).
- (4) Unique to omitted assessments is a 10% per annum interest penalty applied to the tax year “2 years after the time the first correct tax bill ought to have been received.” 35 ILCS 200/9-265(d).

Rule 23: Property Tax Exempt Properties

The Illinois Department of Revenue (IDOR) is the entity which determines whether a property is property tax exempt. The CCAO cannot consider a property as property tax exempt absent the IDOR determination.

- Generally, if IDOR has issued a letter indicating that a property is either fully or partially exempt from assessment, then taxpayer should send a copy of the deed and the IDOR letter to our Exempt Team at Assessor.Exempt@cookcountyil.gov rather than filing an appeal.
- Partial Exemptions – taxpayer may file an assessment appeal on the non-exempt portion of the property, using the same evidence shown in Rules 12-21.
- Taxable Leaseholds - The CCAO uses the principles announced by the Illinois Supreme Court in *Korzen v. American Airlines*, to value taxable leaseholds; however, we often do not have a current copy of the lease. Provide the most current copy of the lease, and any information regarding the lease term, including any options to collect additional rent as a new unexpired term may have been created.

Rule 25: Corrections of Factual Errors

- Factual errors include, but are not limited to: building square footage, building characteristics, PIN prorations, property classification, keypunch/transcription errors, or other errors in assessment due to reasons other than a difference of opinion in valuation.
- Contact us for corrections in factual errors at any time!
- Rule 25 provides a number of methods to contact us, including email, mail, and in person visits.
- Taxpayers must include any and all documentation supporting their request for correction, such as building plans, surveys, etc.



1ST FLOOR PLAN
GROSS FLOOR AREA: 948 SQ. FT.



2ND FLOOR PLAN
GROSS FLOOR AREA: 782 SQ. FT.

Rule 26: Property Location Corrections

- Municipalities, rather than the Assessor's Office, determine the address for any property within its boundaries.
- If taxpayer believes that the Assessor has an incorrect property location address in its system, taxpayer should provide documentation supporting the address change.
- Property location requests should be handled via current year assessment appeal.
- Please see Rule 26 for instructions on filing appeals for Property Location Corrections.



Rule 26: Property Location Corrections

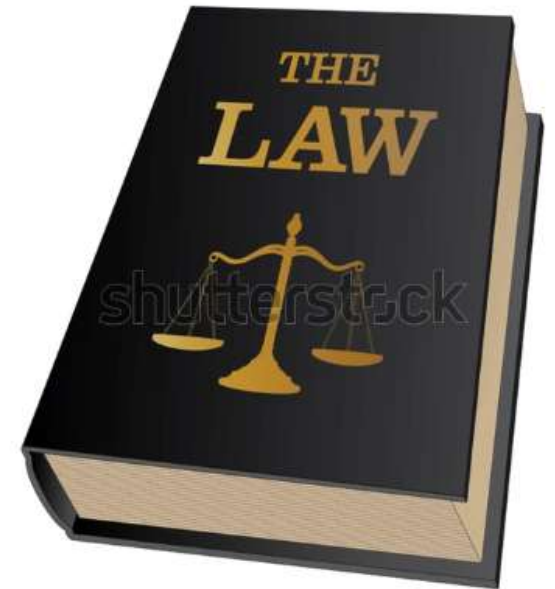
- The CCAO can only update property location addresses in its system prior to certification to the Board of Review. Otherwise, the correction will need to wait until the next assessment cycle.
- The CCAO cannot update the mailing address on a property tax bill. The Cook County Treasurer's Office controls this. Please visit the CCTO's website <https://www.cookcountypropertyinfo.com/> to make the change online.



Rule 27: Certificates of Error

- Property owners can file a Certificate of Error (CofE) for *any* “error or mistake” in Cook County, per Section 14-15 of the Property Tax Code:

In counties with 3,000,000 or more inhabitants, if, after the assessment is certified pursuant to Section 16-150, but subject to the limitations of subsection (c) of this Section, the county assessor discovers an error or mistake in the assessment, the assessor shall execute a certificate setting forth the nature and cause of the error.

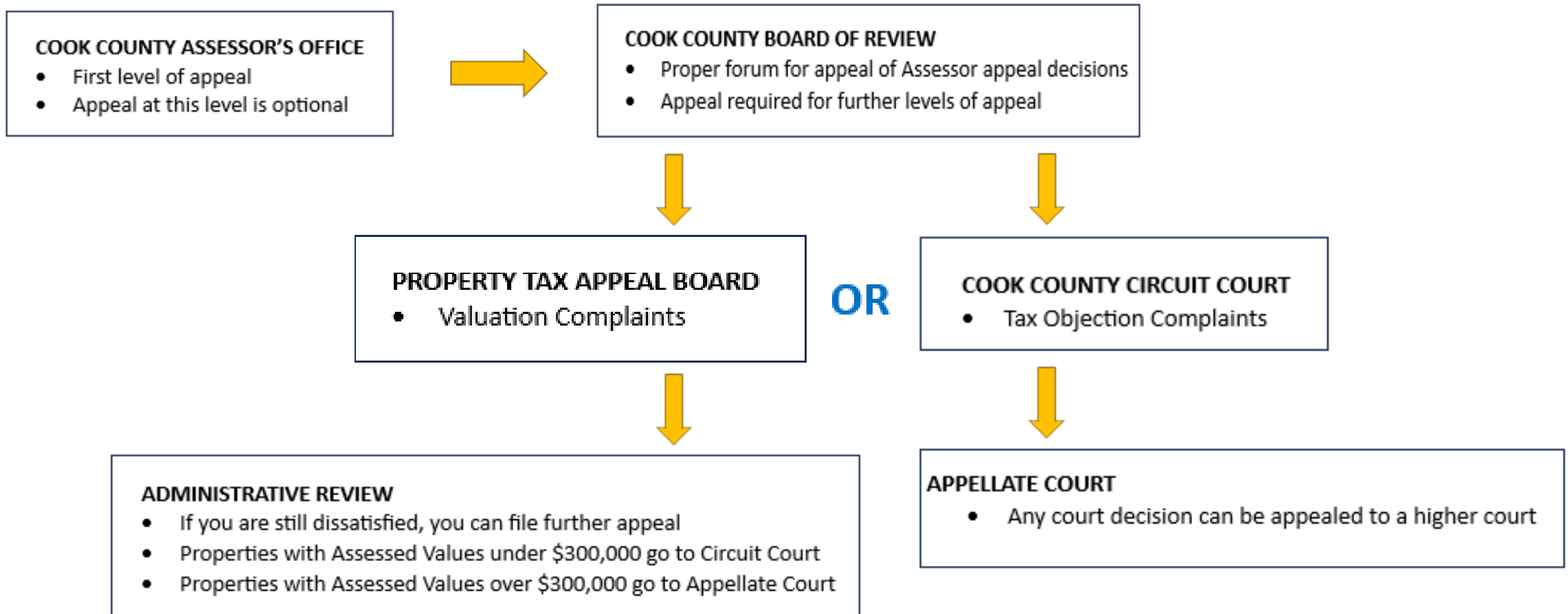


Rule 27: Certificates of Error

- CofEs may be filed either with a current year assessment appeal, or as a standalone. Please see **Rule 27 for filing instructions**.
- However, the CCAO strongly recommends that taxpayers file CofEs with a current year appeal, as it is then easier for filers and our office to track.
- CofE filings should be submitted with the same types of supporting documentation as found in **Rules 12-21**.
- *CofE filings without supporting evidence are unlikely to succeed.*
- *CofEs for tax years which are pending at PTAB or Circuit Court are also unlikely to succeed, except in certain circumstances.*

The Property Tax Code's Appeal Progression Structure

The progression for assessment appeals per the Property Tax Code



Guidelines for Certificates of Error

- If you filed an assessment complaint at the BOR for the same tax year as any Certificate of Error the Assessor later grants that would reduce that BOR-certified assessment, the Assessor must submit that Certificate of Error to the BOR for further review and endorsement before it can be issued.
- If the Assessor's Office recommends a reduction in assessed value of \$100,000 or more, the Certificate of Error must be adjudicated in the Circuit Court.
- The general provisions of the Property Tax Code work to prohibit a dual remedy from both PTAB or a Tax Objection case and a Certificate of Error for the same tax year:
 - **A CofE with the Assessor's Office is not the appropriate forum to alter or appeal PTAB decisions.**
 - **A CofE with the Assessor's Office is also not the appropriate forum to alter or appeal Tax Objection decisions.**

CofEs – Filing Deadlines

The time limit for filing all Certificates of Error (outside of those filed based on non-homestead property tax exempt status) is governed by Section 14-15(c) of the Property Tax Code:

The county treasurer has the power to mark the tax books to reflect the issuance of certificates of error certified according to the procedure authorized in this Section for certificates of error issued under Section 14-25 or certificates of error issued to and including 3 years after the date on which the annual judgment and order of sale for that tax year was first entered. The county treasurer has the power to issue refunds to the taxpayer as set forth above until all refunds authorized by this Section have been completed.

The deadline is based on the date of judgment for the annual tax sale. The CCAO tracks these dates closely.



Changes to Section 14-15(d) for Common Area CofEs

As many practitioners who represent Condominium Associations know, there have been some recent updates regarding common area to Section 14-15(d):

(c) No certificate of error, other than a certificate to establish an exemption under Section 14-25, shall be executed for any tax year more than 3 years after the date on which the annual judgment and order of sale for that tax year was first entered, except that during calendar years 1999 and 2000 a certificate of error may be executed for any tax year, provided that the error or mistake in the assessment was discovered no more than 3 years after the date on which the annual judgment and order of sale for that tax year was first entered.

(d) The time limitation of subsection (c) shall not apply to a certificate of error correcting an assessment to \$1 under Section 10-35 if, during the tax year for which the certificate is executed, the subdivision, association, or planned development used the parcel as common area, as defined in Section 10-35.



CofEs and Exempt Properties

The Property Tax Code at Section 14-25 governs CofEs for property tax exempt properties.

Section 14-25(a) Certificates of Error; Tax Exempt Property

If the property became eligible for the exemption at an earlier time, a certificate of error shall be issued for the period of eligibility, but in no event, except as otherwise provided in this subsection (a), for more than the 3 assessment years immediately preceding the assessment year for which the exemption was approved.

CofEs for these properties can be submitted for up to 3 years prior to the date of the IDOR Letter.



Appeal Rules – to sum it all up!

- Taxpayers and/or their representatives are required to read the appeal rules prior to filing any assessment appeal.
- Current year assessment appeals must be filed timely and within the published appeal window. Early and late appeals are not accepted.
- **Rules 12-21 indicate the evidence** to be submitted in support of an appeal or certificate of error request. *Assessment appeals or CofEs filed without supporting evidence are unlikely to succeed.*
- The **CCAO website** provides a wealth of information regarding valuation of properties and guidance for appeals. **Please visit our site early and often!** <https://www.cookcountyassessor.com/>

The 4 Key CCAO Policies to Know

1. Vacancy Policy

- <https://www.cookcountyassessor.com/form-document/assessors-vacancy-policy>

2. Cap Rate Policy

- <https://www.cookcountyassessor.com/assessors-cap-rate-policy>

3. Policy Governing Demolition & Qualification for Unimproved Real Estate

- <https://www.cookcountyassessor.com/demolition-and-unimproved-real-estate-valuation-policy>

4. Policy Regarding Properties Under Construction

- <https://www.cookcountyassessor.com/commercial-properties-under-construction-valuation-policy>





Questions?

Annual Appeals Rules Meeting

March 13, 2025

Tatia Gibbons, Chief Legal Officer
Christina Lynch, Director of Legal
Gina Matthiesen, Senior Legal Counsel
Michael Piper, Chief Valuations Officer