



2024 GUIDELINES FOR FILING APPEALS AND CERTIFICATES OF ERROR WITH THE ASSESSOR'S OFFICE

To better assist taxpayers and their representatives when filing valuation appeals, certificates of error and other documentation with the Cook County Assessor's Office (CCAO), the CCAO is providing the below guidelines:

I. GENERAL GUIDELINES

- A. Read the Appeal Rules prior to filing. Please provide the requested types of supporting documentation detailed in the appeal rules, so the CCAO analysts can better review your filings. Please also provide any other documentation which supports your specific argument(s), as those will also assist the CCAO analysts.
- B. All documents submitted must be legible. The CCAO analysts cannot reasonably evaluate a document which they cannot read.
- It is best to type out information on affidavits. If handwritten, filers should make sure the writing is clear and legible.
 - All photographs submitted as evidence should be in color and clear; rather than blurry, smeared, or too faint/too dark to see the subject of the photograph. Please note that all photographs must be dated, or an attestation as to the date the photographs were taken should be provided. Filers may use the CCAO's General Attestation form for this purpose.
 - All documents submitted as evidence should be clear and easy to read. Filers should not submit copies of documents which are smeared, blurry, or too faint/too dark to read.
 - Filers can obtain clean copies of all recorded documents from the Cook County Clerk's Office.
 - Clean copies of most real estate closing documents can be obtained from the filer's real estate attorney, lender, or title insurer.
- C. All documents submitted must be complete. The CCAO analysts cannot effectively evaluate a document which is incomplete.
- If filer cannot obtain a complete copy of a relevant document, filer can state so by using the General Attestation form to advise our office that the filer does not have a complete copy, the circumstances as to why the filer does not have a complete copy, and efforts to obtain a complete copy. Filer should make reasonable efforts to obtain complete copies of all documents being submitted in support of an appeal or certificate of error.

- Recorded documents can be obtained from the Cook County Clerk’s Office. The CCAO will not obtain the needed documents from the Clerk’s Office on filer’s behalf.
- Complete copies of most real estate closing documents can be obtained from filer’s real estate attorney, lender, or title insurer.
- Complete all documents which are required for the particular filing, such as Certificate of Error Applications, Attorney Authorization Forms, RPIE, etc.

D. Documents should be redacted for NPPI (non-public personal information) for the protection of the filing taxpayer. Filers should not risk exposing themselves, or their clients, to the possibility of identity theft by carelessly handling NPPI.

- Illinois Supreme Court Rule 138 lists the types of NPPI that should be redacted: social security numbers (FEIN numbers for business filers), driver’s license numbers, financial account numbers, credit and debit card numbers.
- The general practice is to redact all digits except for the last four.
- The CCAO will not redact documents for filers – filers are responsible for redacting their own documents submitted to the CCAO.
- Redaction tips:
 - There are various programs, such as Adobe Acrobat Pro, which can be used to make redactions. There are also some free online resources for redactions. The CCAO does not endorse any specific program or resource.
 - Filers can always black out NPPI with a marker, photocopy the document, and then submit the photocopy.

E. Watch out for “double dockets”. Generally, “double dockets” are caused by one of two reasons:

- Condominium filings, where appeals are filed for both the entire building and also an individual unit(s):
 - Attorney filers should be sure to ask their clients to confirm that all unit owners in the building have agreed to file together – check with the Condominium Association leadership; or
 - If representing an individual unit owner confirm that there is not also a filing for the building as a whole – check with the Condominium Association leadership.
- Pro se filings, where the filer enters an appeal based on comparable properties incorrectly into SmartFile, creating appeals for each property rather than simply entering as a comparable property:
 - Not typically an attorney filer issue, but do be careful when filing an appeal based on comps; and
 - If you receive notification regarding a double docket, please follow the instructions you are given by the CCAO.
 - The correct contact information at the CCAO regarding double docket issues is assessor.onlineappeals@cookcountyil.gov, unless you are instructed otherwise by our office.

F. Content is Key. The better an argument for a change in valuation is presented, the higher the likelihood of success.

- **NOTE:** please make sure you are filing on behalf of the correct party, such as an owner or lessee who is responsible for paying the taxes; please do not file on behalf of lienholders.
- Arguments should be clearly, completely, and succinctly stated; all briefs, affidavits, applications, and other explanatory documents and evidence should be organized, legible, and complete.
 - If requesting a class change, specifically state so. If filing an appeal for an omitted assessment, specifically state so. If applying for an incentive, specifically state so. If requesting a reduction in assessed valuation due to vacancy/demolition, etc., specifically state so. Using clear headings, such as “Omitted Assessments”, “Class Change”, “6B Incentive Request”, “Property was Demolished”, etc. in your brief is very helpful.
Do not make the CCAO analyst guess at what you want.
 - Exclamation points, bold face or capitalization, statements concerning the unfairness of property taxes, or letters of protest regarding CCAO Appeal Rules, are simply no substitute for complete, well-organized arguments with appropriate supporting documentation.
- For all valuation appeals and certificates of error, filer should state their opinion as to the fair market value of the property, as required by CCAO Appeal Rule 5.
 - Filer should double check the accuracy of their math and show their calculations in an organized fashion.
 - For valuation arguments based on income analysis, be sure to use reasonable, market supported cap rates, expense ratios, and vacancy & collection percentages.
 - **Using an inflated expense ratio, which has the effect of including property tax payments as an expense, along with a loaded cap rate is unacceptable. You must consult the CCAO’s [Cap Rate Policy](#), which is instructive on its approach to converting income into value.**
- If there is a particular document, or a portion of a document, which is particularly important for the for the CCAO analyst to review, please highlight the relevant information contained in the document in the brief or other explanatory documents.
 - If your argument turns on Section 35 (a)(2)(i) of a 280-page document, highlight that ***specific section and language in your brief.***
- G. Decorum in Communications and Behavior. Any form of aggressive or threatening behavior towards CCAO staff will not be tolerated. Respectful and professional behavior is expected of both taxpayers and their representatives in all interactions with CCAO employees. All CCAO staff have the right to carry out their duties without being abused, harassed, threatened, or fearing for their personal safety.

- CCAO staff stand ready to assist taxpayers and their representatives with inquiries to our office; however, it is unacceptable for either taxpayers or their representatives to treat CCAO employees with disrespect, or in an abusive or threatening manner.
- Written or verbal communications which are loud and aggressive, rude and abusive, harassing and prejudicial, threatening in nature, or profane are unacceptable. CCAO employees are fully authorized to immediately end any communications with the taxpayer or his/her representative if such behavior occurs.
- While attorneys and other representatives are of course required and expected to represent their client's interests, reasonable standards of conduct, as governed by Rules of Professional Conduct, apply. Any violations of these standards of conduct may result in referral to the ARDC, IDFPR, or other relevant regulatory agency.
- Abusive and/or threatening behavior by any taxpayer, or their representative, during an in-office visit, may result in the removal of the person from the premises by the Cook County Sheriff's Office and a potential referral for criminal prosecution.
- Written or verbal communications via telephone which are abusive, harassing, or threatening in nature may be reported to local law enforcement authorities for further investigation and potential criminal prosecution
- Any assault and/or battery of our employees will be reported to law enforcement for prosecution to the fullest extent of the law.

II. GUIDELINES REGARDING COMMON APPEALS AND RELATED ISSUES

A. Vacancy filings. Please make sure your vacancy filings are organized, complete, and accurate. Consult the CCAO's Vacancy Policy prior to filing.

- The CCAO receives many vacancy filings by attorneys and property tax representatives with Google Maps photographs depicting the wrong building. It is best practice to use dated color photographs of the interior and exterior of the actual building in question rather than providing outdated, and potentially inaccurate, Google Maps photographs.
- Please thoroughly review appeals and certificates of error prior to filing to prevent instances of incorrect building photos, incomplete or illegible documents, etc.
- Rent rolls should be complete, with the actual names of tenants (both residential and commercial), rental amount, square footage of the space rented, whether the lease is gross, net, triple net, etc., and the term of the lease.
- Showing attempts to lease vacant spaces is important. Leasing agent agreements, photographs or copies of leasing advertisements, information regarding online leasing advertisements, etc. can be important documents to assist the analyst in arriving at a vacancy determination. Please note that a property cannot sit vacant for years with no mitigation and continue to receive assessed value reductions.
- If vacancy was due to a casualty event (fire, flood, or natural disaster), provide details and documents as evidence, such as dated color photographs, insurance

reports, inspection reports, building permits for repairs, contractor invoices for repairs, construction budgets with lien waivers, etc.

- Please note that generally only 24 months of vacancy reductions for any one qualifying event will be granted. Please see the CCAO's Vacancy Policy which is posted on the Assessor's website, <https://www.cookcountyassessor.com/>.

B. Uniformity/Equity Analysis, or "Comps". The CCAO is looking for quality in "comp" choices for arguments based on uniformity/equity analysis.

- **Comps should be selected based on proximity to the subject property and characteristics in common with the subject.** Comps should not be cherry picked to include only the lowest valued properties in the area. There are programs which make selecting only the lowest valued properties very easy; however, these same programs can be used to instead choose high quality comps to support your arguments.
- Unless a property is truly unique or unusual in some way, the CCAO is not overly concerned with outbuildings such as sheds, or other outdoor structures such as swimming pools.
- **These are the seven most important factors in choosing residential comps:**
 - Proximity. The CCAO analysts are looking for comps which are closest to the subject, rather than those which are the lowest in value.
 - Square Footage. It is best to choose comps which are similar in size to the subject.
 - Age. It is best to choose comps which are similar in age to the subject.
 - 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.
 - Basement. It is best to choose comps which have similar types of basements to the subject – slab, crawl, unfinished, finished.
 - Land Square Footage. It is best to choose comps which have similar site size.
 - Garage. It is best to choose comps which have similar types of garages to the subject – attached, detached, number of vehicles.

C. RPIE 2.0 LAUNCH. NO RPIE CODES NEEDED!

- The CCAO no longer requires an RPIE code for the required RPIE filings; in fact, there is no longer a separate RPIE process.
- Rather, RPIE 2.0 is comprised of the Property Characteristics and Income and Expense Information tabs as part of the Commercial/Industrial appeal process. Just fill out the required data fields in SmartFile as you go.
- This new process should be simpler and less time-consuming for all filing Commercial/Industrial appeals.
- The collection of property characteristics and income and expense data assists the CCAO in providing better assessments for all commercial and industrial properties in Cook County.
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- Please note: incomplete or inaccurate data entry in SmartFile may be grounds for a “no change” result for any Commercial/Industrial appeal.

D. Property Inspection (“field check”) Requests. CCAO Field Inspectors need access to the property to conduct a property inspection, and also deserve to be treated with utmost respect.

- There have been an increasing number of incidents where taxpayers who requested a property inspection refuse the CCAO’s Field Inspectors access to view their property.
 - This includes calling the police to report CCAO Field Inspectors as trespassers, or using prejudicial, harassing, abusive, profane, or threatening language to the CCAO’s Field Inspectors.
 - The refusal to allow a CCAO Field Inspector access to the property for review may result in the denial of taxpayer’s appeal.
 - A taxpayer may always call the CCAO to confirm the identity of a CCAO Field Inspector if the taxpayer questions the Field Inspector’s credentials.
- The CCAO’s Field Inspectors normally only inspect the exterior of a property; they do not conduct interior inspections except in extraordinary circumstances, and then only with a prior authorization, agreement and coordination with the taxpayer.
- Property Inspections are not conducted to confirm vacancy or demolition. Rather, taxpayers are expected to include the requested information as set forth in the CCAO’s appeal rules. .
- Many Property Inspections are done remotely or through verification of appeal documents. Therefore, a taxpayer may not see a Field Inspector in person, but the Property Inspection was completed.
- Taxpayer representatives who file appeals on behalf of a taxpayer and request a property inspection are fully expected to advise the taxpayer that a property inspection was requested and a Field Inspector may appear on their property.
- Please also refer to the Section in this document titled “Decorum in Communications and Behavior” for further guidance.

III. CHOICE OF FORUM – CERTIFICATES OF ERROR, BOR, PTAB, CIRCUIT COURT

- A. The CCAO has noticed an increase in the number of Certificate of Error requests where the tax year in question was previously appealed to either the Assessor’s Office (CCAO), the Board of Review (BOR) or the Property Tax Appeals Board (PTAB). While it is filer’s choice as to the forum in which to file an appeal, there are implications for each choice.

Please note: This discussion only applies to those Certificates of Error requesting valuation changes: those that request the application of a homeowners, senior, veterans or similar exemption are excluded from the below guidelines. (The CCAO will review any timely filed certificate of error for an exemption and apply the exemption if the taxpayer is entitled to receive it).

- B. Prior tax year was appealed to the CCAO: If the taxpayer previously appealed his/her tax assessment to the the CCAO, either via current year appeal or prior Certificate of Error request, a new Certificate of Error request is less likely to be successful unless:
1. There is substantial information regarding an error provided (such as in square footage, building characteristics, PIN proration, classification, or keypunch or transcription error);
 2. If the Certificate of Error request concerns the application of an incentive; or
 3. If there is evidence provided showing that the property was substantially damaged by a casualty event (fire, flood, natural disaster) or was demolished.

Please note that Certificate of Error requests for years previously appealed to the CCAO, which are based only on differences of opinion in valuation or on vacancy outside of a casualty event, are less likely to be successful.

- C. Prior tax year was appealed to the BOR: If the taxpayer previously also appealed to the BOR, the Certificate of Error request is less likely to be successful unless:

1. There is substantial information regarding an error provided (such as in square footage, building characteristics, PIN proration, or classification);
2. If the Certificate of Error request concerns the application of an incentive; or
3. If there is evidence provided showing that the property was substantially damaged by a casualty event (fire, flood, natural disaster) or was demolished.

If the Certificate of Error for a tax year previously appealed to the BOR is granted by the CCAO, that Certificate of Error must also be endorsed by the BOR per Section 14-15 of the Property Tax Code. This can be a very lengthy process. Please note that Certificates of Error may only be sent to the BOR by the CCAO for endorsement pursuant to Section 14-15 of the Property Tax Code, not by taxpayers or their representatives.

Please note that the Property Tax Code directs that, when dissatisfied with a Board of Review decision, taxpayers should appeal to either PTAB or the Circuit Court, rather than going back to the Assessor to appeal via the Certificate of Error process.

- D. Note regarding reductions in Assessed Value of \$100,000 or more. If the Assessor's office recommends a reduction in the assessed value in excess \$100,000, the Certificate of Error must be adjudicated in Circuit Court. Please note that these Certificates of Error may only be sent for filing with the Circuit Court by the CCAO pursuant to Section 14-15 of the Property Tax Code, not by taxpayers or their representatives.

Certificates of Error are filed with the Circuit Court as objections to the tax sale, rather than as one-off filings per the Property Tax Code. Therefore, Certificates of Error are sent periodically in batches to the Cook County State's Attorney's Office.

- E. The tax year was appealed to PTAB: The general provisions of the Property Tax Code work to prohibit a dual remedy from both PTAB and a Certificate of Error for the same tax year. If a taxpayer is dissatisfied with a PTAB decision, taxpayer should file a complaint for administrative review with either the Circuit Court or the Appellate Court per Section 16-195 of the Property Tax Code. A Certificate of Error with the Assessor's Office is not the appropriate forum to alter or appeal PTAB decisions. Therefore, barring extraordinary circumstances, the CCAO will generally deny any Certificate of Error request for a tax year which is currently pending at PTAB, or which has already been decided by PTAB.

The same applies for those Certificates of Error which have already been adjudicated by the Circuit Court.

- F. Filing timelines for Certificates of Error: The time limit for filing all Certificates of Error (outside of those filed based on non-homestead property tax exempt status) are governed by the Property Tax Code at Section 14-15(c) which states:

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.