

The CCAO's Rules provide requirements, parameters, and guidance to persons preparing or filing appeals for review by the CCAO. CCAO personnel will assist taxpayers and their agents on matters regarding the Rules and the filing of appeals during the CCAO's business hours. Please be advised that the filing of an appeal does not guarantee that a decision in favor of a reduction in valuation will be granted by the CCAO. Rather, all appeals and supporting documentation are subject to CCAO review.

The substantive changes or clarifications to the Appeal Rules for tax year 2026 are as follows:

- **Generally:** The CCAO's website has been updated to a .gov domain. The appeal rules generally reflect this change. Please see the CCAO's website for all our services: <https://www.cookcountyassessoril.gov/>.
- **Rule 4:** Specifies that any attorney, tax representative, or any other agent filing a homestead exemption application on behalf of a client must do so electronically, using our Exemption Filing platform found on our website, <https://www.cookcountyassessoril.gov/exemptions>.
- **Rule 8:** Provides that the deadline for filing a substitution for an appeal is 14 days after the appeal closing deadline.
- **Rule 10:** Clarifies that all supporting documentation for an appeal must be filed by the appeal deadline.
- **Rule 12:** Provides clarification regarding photographs submitted with any appeal.
- **Rule 14:** Specifies that any cap rates used in an appraisal must be based on relevant current market data.
- **Rule 15:** Provides further guidance for filing arguments based on "comps" (either equity analysis or sales comparison analysis), particularly as to the inclusion of photographs; plus provides additional tools for filers to use when searching for "comps".
- **Rule 16:** Provides that all cap rates used in an appeal must be based on current market data.
- **Rule 20:** The CCAO's Vacancy Policy has been updated to include both market related and renovation related vacancy for income producing properties. Please review the updated policy prior to filing any appeals based on vacancy.

## **GENERAL PROVISIONS**

**Please Note: References in these Rules to the actions of a taxpayer or filer include actions of an authorized agent acting on behalf of a taxpayer or filer.**

**Rule 1**      **Rules and Policies.** Failure to follow any of these Rules, or any other CCAO rules and policies that are applicable to a particular appeal may result in denial of filers appeal. However, the CCAO will not summarily deny an appeal if the submission substantially complies with these Rules. Please note that the filing of an appeal does not guarantee a reduction; rather all appeals are subject to CCAO review.

## Rule 2

### **Forms and Documentation – General Provisions.**

- **CCAO Forms.** All forms provided by the CCAO for appeal filing must be fully completed before they are submitted in support of an appeal. This includes a signature by an authorized party on those forms which have a signature block. CCAO appeal forms may be found online at <https://www.cookcountyassessoril.gov/forms>
- **Documentation in Support of an Appeal, Redaction, Signature, and Notarization.**
  - **Legible and Complete.** All documentation submitted in support of an appeal must be legible and complete. Please see the “Appeal Guidelines” found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor> for more information and guidance.
  - **Redaction of NPPI.** Non-public personal information (“NPPI”) must be redacted by the filer prior to filing an appeal. NPPI includes, but is not limited to, social security numbers (SSN), employer identification numbers (FEIN), driver’s license numbers, financial account numbers, and credit and debit card numbers. Please see the “Appeal Guidelines” found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor> for more information and guidance on NPPI redaction.
  - **Photocopies and “Wet Ink” Signatures.** The CCAO accepts photocopies and scans of CCAO Forms and other signed or notarized documents but reserves the right to require or request the original form with a “wet ink” signature.
  - **Notarization of Forms and Affidavits.** If a current CCAO form indicates that a notarized signature is required, then the form must be notarized under the provisions of Illinois law, including any electronic notarization. CCAO forms require notarization when the relevant ordinance or statute requires an affidavit. All affidavits must be signed by a person having personal knowledge of the facts.

## Rule 3

**Property Inspection (“Field Check”) Requests.** The CCAO may deny any appeal filed by taxpayers or their representatives who request a property inspection but then refuse to allow a CCAO Inspector access to survey the exterior of the improvements on their property. The CCAO typically does not conduct interior property inspections. In the limited instances where an interior inspection is required, our Data Collection team will contact filer directly to make arrangements.

Please be advised that the above also applies to any property inspections which may be required for Certificate of Error requests, property characteristic or location correction requests, or class change requests.

#### Rule 4

**Homestead Exemptions.** Do not use the SmartFile appeal filing system to request or apply for any type of homestead exemption. Doing so may cause serious delays in the review of the homestead exemption request. Rather, please see our website at <https://www.cookcountyassessoril.gov/exemptions> for instructions on how to apply for homestead exemptions, including any Certificates of Error for homestead exemptions.

Please note: Attorneys, tax representatives, or other agents who are filing an exemption application on behalf of any client are required to file electronically, using our Exemption Filing platform found on our website: <https://www.cookcountyassessoril.gov/exemptions>.

### **FILING ASSESSMENT APPEALS, REPRESENTATION, AND DEADLINES**

#### Rule 5

**Appeal Filing General.** An appeal is created by properly and timely filing a complaint form and supporting documentation with the CCAO using SmartFile or other methods as detailed below.

- **No Requirement for Attorney Representation.** No party is required to be represented by an attorney or other agent when filing an appeal at the CCAO, including parties that are business organizations such as LLCs.
- **SmartFile.** SmartFile is the CCAO's electronic appeal filing system, accessed on our website at <https://www.cookcountyassessoril.gov/online-appeals>.
- **Email Submissions to Individual CCAO Employees Prohibited:** It is a violation of these rules to email an appeal to any individual CCAO employee(s) in lieu of filing an appeal via SmartFile, or via one of the alternate methods listed below. Doing so may result in the appeal not being filed.
- **Filings by Practitioners - SmartFile.** All practitioners, including attorneys, property tax representatives, and other agents, must file appeals using SmartFile. Other methods as outlined below for *pro se* filers may only be used by practitioners in the event of a SmartFile outage.
- **Pro se Filers.** *Pro se* (individual self-represented filers) should also use SmartFile to file appeals with the CCAO. However, if a *pro se* filer does not have adequate access to the internet, a *pro se* filer may do the following:
  - **Internet Access.** Most local libraries have free internet access for the public. Additionally, the CCAO provides self-service stations in its downtown office located at 118 North Clark Street, Room 301, Chicago IL that taxpayers may use to file their appeals via SmartFile. Please note that our satellite offices do not currently provide these self-service stations.

- **Email Filing.** A *pro se* filer may file an appeal by emailing the appeal documents to [assessor.onlineappeals@cookcountyil.gov](mailto:assessor.onlineappeals@cookcountyil.gov) if they cannot access SmartFile via the internet. Please state "Assessment Appeal" in the subject line, and also include the township and controlling/lead PIN in the subject line.
- **In Person Filing.** A *pro se* filer may also file an appeal in person in our downtown office located at 118 North Clark Street, Room 301, Chicago IL. However, such filers must do so during the CCAO's normal business hours.
- **Requests for CCAO appeal forms:** *Pro se* filers who do not have adequate internet access may request an appeal form by emailing the CCAO at [assessor.onlineappeals@cookcountyil.gov](mailto:assessor.onlineappeals@cookcountyil.gov), calling 312-443-7550, or visiting the CCAO in person at 118 North Clark Street, Room 320, Chicago IL

**Rule 6** **Attorney and Agent Authorization for Filing and Representation of Taxpayers.** At the time of appeal filing, any agent (attorney or other duly authorized party) must file an Authorization Form certifying that the agent is authorized by the taxpayer to file the appeal and is the only party authorized to do so. No document may be substituted in lieu of the CCAO's Authorization Form, which can be found online at <https://www.cookcountyassessoril.gov/forms>.

**Rule 7** **First Appeal is the Controlling Appeal.** The CCAO regards the first appeal filed on a PIN to be the controlling, operative appeal. The CCAO will provide a warning message, either in SmartFile or via email to filers who submit a duplicate appeal for a PIN. Filers who receive this warning message, either via SmartFile or email, but believe that they have authority to file the appeal should first double check the identity of the filer on the CCAO's website and then contact the current filer to discuss whether a Withdrawal and/or Substitution Form should be completed. Please see Rule 8 for withdrawal and substitution instructions.

- **Avoiding Duplicate Filings.** It is strongly recommended that filers first check their property on the CCAO's website at <https://assessorpropertydetails.cookcountyil.gov/forms/htmlframe.aspx?mode=content/home.htm> to see if an appeal has already been filed. You may search by PIN (highly recommended), Address, or via a mapping feature.
- **Duplicate Filing Warning.** As the first appeal filing is considered the controlling appeal by the CCAO, do not ignore the duplicate filing warning. It is likely to result in the denial or non-filing of your appeal.
- **Further Questions Contact.** If further questions arise regarding a duplicate filing, please send an email to [assessor.onlineappeals@cookcountyil.gov](mailto:assessor.onlineappeals@cookcountyil.gov).

**Rule 8** **Attorney and Agent Substitutions.** An authorized party may substitute an appearance on behalf of a taxpayer by filing a fully executed Withdrawal and/or

Substitution Form, which can be found online at <https://www.cookcountyassessoril.gov/forms>.

- **When to File and Filing Deadline for Withdrawal and Substitutions.** The CCAO strongly encourages parties to file substitutions prior to the township's appeal closing deadline to ensure timely processing. However, the **final deadline** for filing a substitution in an appeal is no later than 14 days after the official appeal closing deadline posted on our website.
- **Withdrawal and/or Substitution Forms** must also be submitted to [assessor.onlineappeals@cookcountyil.gov](mailto:assessor.onlineappeals@cookcountyil.gov) for processing.

#### Rule 9

**Anonymity of Attorney and Authorized Agent Filers, and Anonymization Requirement.** Any attorney or other authorized agent filing an appeal on behalf of a taxpayer must submit two sets of signed documents at appeal: an anonymized set and a non-anonymized set.

- **Anonymization.** Attorneys and other authorized representatives must submit one set of documents in which the law firm, attorney, or representative is not identified by name, mailing, address, or phone number on any document in the set. This “anonymized” set of documents must include only the attorney or representative’s assigned identification code as a means of determining the filer’s identity.
- **Documents to be Anonymized.** This second set of anonymized documents is limited to those that would normally be signed by the attorney or representative, such as an appeal brief, Authorization Form, Withdrawal and/or Substitution Form, or CCAO forms which include a signature block for the attorney or authorized representative. Documents which are not signed by the attorney or authorized representative do not need to be anonymized.
- **Filing of the Non-Anonymized Set of Documents.** The non-anonymized set of documents should be uploaded in SmartFile using the “Attorney Authorization & Other Non-Anonymized Documents” upload function.

#### Rule 10

**Deadline for Appeal Filing and Supporting Documentation Submissions.** An appeal plus all supporting documentation (evidence) must be filed on or before the official appeal closing date for the Township where the property is located. Closing dates are calculated and published according to Illinois law. Additionally, all opening and closing dates can be found on our website at <https://www.cookcountyassessoril.gov/assessment-calendar-and-deadlines>. These are “hard” deadlines – the CCAO will **not** accept **any** appeal or supporting documentation after the township closing date, except in cases of CCAO system error. Please provide documentation showing that such an error occurred, such as screenshots or an email indicating an error.

#### Rule 11

**Miscellaneous Appeal Filing Rules - General.** Please see the “Appeal Guidelines” or review the video for the “Annual Appeal Rules Meeting” for further

information, guidance, and instructions on appeal filing. Both are found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor>.

- **Brief in Support of Valuation Argument.** Filers are encouraged to file an explanatory brief in support of their appeal filings. There is no set brief format; however, briefs are a short statement regarding the reasons for the appeal and should be concise and well-organized. The main purpose of the appeal brief is to communicate the basis of the appeal.
- **Estimated Fair Market Value.** Filers must specify the estimated fair market value of the property in their CCAO appeal. Filers must provide sufficient information and/or evidence in support of their arguments for valuation reduction.
- **Properties Which are Part of Real Estate Investment Funds.** Commercial and Industrial filers whose properties are part of a real estate investment fund (such as a REIT) must provide the name and address of the fund as well as the current underlying value of the property as set forth in the fund's annual reporting documents.
- **Two or More Parcels & Controlling/Lead PIN, including Condominium or Townhome Properties.**
  - Contiguous PINs: A single appeal must be submitted for properties which consist of two or more contiguous PINs. An example is one single family home which spans two or more PINs. The controlling/lead PIN must be listed first, and all PINs associated with the property must be listed in the appeal. If the PINs are of equal value, show the PINs in numerical order.
  - Non-Contiguous PINs. Separate appeals must be filed for PINs which are not contiguous, unless the PINs constitute one economic unit. An example of non-contiguous PINs which are one economic unit is a scattered site apartment complex. All PINs associated with the property must be listed in the appeal. The controlling/lead PIN must be listed first, and all PINs associated with the property must be listed in the appeal. If the PINs are of equal value, show the PINs in numerical order.
  - Condominium/Townhome PINs may be Filed by the Association, or by Individual Unit Owners. The owners of condominiums and townhomes are strongly encouraged to file with their Association. However, individual owners may also opt out of filing with their Association and file as to their individual unit(s) only. Such filers should clearly state in their appeal that they are filing for their individual unit(s) only. Filings by the Association must include all the PINs located in the Association, except for those whose owners have opted out. PINs for Associations should be listed in numerical order.

- **Review of Property Details Information by Filers.** Filers are required to review the information regarding their property on the CCAO's website. This information can be found in the "property details" section which is accessed by clicking the "big blue button" at the bottom of the page for any PIN search. **If the taxpayer reasonably believes that any of the information appearing on the website is incorrect, taxpayer must clearly state so in their appeal and provide the corrected information.** Please note that SmartFile also has a function which allows a taxpayer to file an update to the residential property characteristics on a PIN. When updating the property characteristics, the taxpayer must provide sufficient information and/or evidence in support of the requested change.

## **EVIDENCE IN SUPPORT OF AN ASSESSED VALUATION APPEAL**

**Rule 12**      **Supporting Evidence – General Requirements for All Appeals.** All documentation submitted in support of an appeal must be legible and complete, and filed prior to the appeal filing deadline. **Please note that the below rules apply to all categories of appeals. Please review this information carefully prior to filing an appeal.**

- **Affidavits.** All affidavits submitted in support of an appeal must be signed by a person having personal knowledge of the facts. An affidavit filed on behalf of a business entity, such as a corporation, LLP, limited partnership, or REIT (or other Trusts) etc., may be filed by a duly qualified representative of the entity based upon that affiant's inquiry of, and based on facts ascertained from representatives of the business entity having knowledge of all the facts. Please see Appeal Rule 2 regarding notarization.
- **Photographs Required for All CCAO Appeals.** Except for individual pro se taxpayers filing an appeal for their own residence, all appeals to the CCAO must include a photograph of the front of the subject property. All photographs submitted in support of an appeal must be clear, in color, and date stamped within 1 year of the lien date (January 1) of the appeal year. Photographs taken via cell phone or similar electronic devices are highly encouraged as most of these devices have an application or other option to date stamp. In lieu of a date stamp filer may instead submit an Attestation to state the date the photographs were taken. The Attestation form can be found online at <https://www.cookcountyassessoril.gov/forms>.
- **Rent Rolls, Income and Expense Statements, and Other Business Records.** All business records submitted in support of an appeal should be signed by the taxpayer or their authorized representative. Electronic or facsimile signatures are acceptable. The signature on each of these documents constitutes a representation that the facts appearing thereon are true and correct to the best of the signer's knowledge. The advocate-witness rule is not applicable to proceedings before the CCAO.

- **Purchase/Sale Documents must be Submitted for all Properties Which Have Recently Sold.** Filers must disclose the purchase/sale date and purchase/sale price of the subject property if the purchase/sale took place within two years of the lien date (January 1) of the appeal year. **This rule applies whether the appeal reason is based on the purchase/sale price or not, and whether the sale was an arm's length transaction or not.** All relevant purchase/sale documents must also be submitted. Please see Appeal Rule 13 for all rules regarding the submission of purchase/sale documentation and related information.

**Rule 13** **Purchase/Sales Arguments and Required Documentation.** This rule applies to all properties which have recently sold (See Rule 12 for specifics), and for those appeals which are based on purchase/sale price.

- **Photograph of the Subject Property.** See Rule 12 regarding photographs.
- **Purchase/Sale Price and Date.** Filers must provide the purchase/sale price and purchase/sale date.
- **Inclusion of Personal Property.** Filers who assert that the purchase/sale price includes personal property must submit the PTAX-203, or an affidavit as to all the information included in the PTAX-203 related to the transaction.
- **Relevant Purchase/Sales Documents.** Filers must provide all relevant purchase/sales documents. Such documents include, but are not limited to, the Purchase and Sale Agreement, Deed, and Closing Statement. The CCAO also strongly encourages that the PTAX-203 accompany any appeal based either in whole or in part on purchase/sales price.
- **Identity of the Parties to the Transaction.** Filer must disclose the identities of both the buyer and seller, including the beneficiary of any trust and any relationship between them (including, but not limited to those existing by blood, marriage, corporate parent-subsidiary companies, or by virtue of ownership of non-publicly held stock and whether the transaction was arms-length).
- **Purchase/Sale Price Substantially Differs from the CCAO's Valuation.** When sales documents reflect a sales pricesubstantially above or below the CCAO's current valuation, taxpayers must provide an affidavit explaining the circumstances leading up to the sale, including prior purchase proposals, cash amounts offered, length of time on the market, and the reasons for the sale.
- **Short Sales, Forced Sales, and REO Sales.** If the transaction was a short sale, forced sale (foreclosure, bankruptcy, tax sale, etc.), or REO sale, filer must provide the details of the transaction in an appeal brief, and provide all relevant supporting documentation. Such documentation may include but is

not limited to: Purchase and Sale Agreement, Closing Statement, Court Orders or similar documentation (such as an Order Approving Sale or Receipt of Sale), and Deed (Tax, Judicial, or Bankruptcy Trustee's Deed, or Deed in Lieu of Foreclosure).

#### **Rule 14**

**Appraisals**. All appraisals submitted in support of an appeal must pertain to the property's Highest and Best Use and must comply with the Uniform Standards of Professional Appraisal Practice ("USPAP") and Illinois state law. Therefore, all appraisals must be credible under USPAP standards.

- **Age of Appraisal**. All appraisals submitted in support of an appeal should be dated within the triennial period for the property being appealed, or at least no more than 2 years prior to the lien date (January 1) of the appeal year.
- **Dated Photographs**. All appraisals submitted in support of an appeal must include an original, color, date stamped photograph of the front of the subject property, plus photographs of all comparable properties used in its valuation analyses
- **Inclusion of All PINs**. All appraisals submitted in support of an appeal must include the PIN(s) of the subject property, plus the PIN(s) of all properties used in its valuation analyses.
- **Sales and Market Data**. All appraisals submitted in support of an appeal must be based on available, reasonable, and truly comparable sales and market data and not engage in "cherry picking" or using inappropriate valuation concepts and methods.
- **Cap Rates**: All appraisals using the income approach to valuation must use cap rates based on relevant current market data.
- **Inclusion of All Appraisals or Other Estimates of Value Prepared within Two Years of Lien Date**. Filers must provide all subject property appraisal reports and any other valuation reports (including those for financing and management purposes) prepared within 2 years prior to the lien date (January 1) of the appeal year.
- **Gross Violations of USPAP Standards - Consequences**. Appraisals which are believed to be in gross violation of USPAP standards or the Real Estate Appraiser Licensing Act may be reported to the IDFPR for further investigation. Additionally, such appraisals will not be considered credible evidence in support of filer's appeal.

#### **Rule 15**

**Equity Analysis/Sales Comparison Analysis/"Comps"**. Appeals based on "comps" must be based on properties which are of similar size, class, characteristics, and location. Filers should refrain from "cherry picking" only those comparable properties which are lower in value than the subject property.

Appeals based on “comps” should include the following:

- At least 3 comparable properties must be provided; however, at least 5 comparable properties are recommended.
- Filers, except individual taxpayers filing an appeal for their own residence, should include a recent photograph the front of the subject property (See Rule 12 for photograph requirements).
- Filers, except individual taxpayers filing an appeal for their own residence, should also include photos of the front of each comparable property (See Rule 12 for photograph requirements).
- All filers must provide the PIN for each comparable property used.
- If filing on sales “comps”, each sale should be an arm’s length transaction for fair market value, rather than distressed sales or sales between related persons or entities.

Please see the “Appeal Guidelines” found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor> or our website at <https://www.cookcountyassessoril.gov/what-are-comparable-properties> for further information and guidance for choosing appropriate comparable properties.

The below tools are free of charge and useful for finding comparable properties:

- SmartFile Comps Grid, available in the SmartFile application when you are filing an appeal;
- CCAO’s Home Value Report, found at <https://www.cookcountyassessoril.gov/home-value-report>;
- CCAO’s Housing Market Tracker, found at <https://www.cookcountyassessoril.gov/cook-county-housing-market-tracker>; and
- Cook County GIS Department’s CookViewer, found at <https://maps.cookcountyil.gov/cookviewer/>.

**Rule 16** **Income Producing Property.** For the purposes of this Rule, **income-producing property is defined as a parcel which is either entirely or partially non-owner occupied and generates rental income.** However, residential properties with 6 units or less are excluded. Hotels and motels are considered income-producing property for the purposes of these Rules regardless of whether they are owner-occupied.

To understand how the CCAO converts income into value for income-producing property, filers should consult the CCAO’s [Cap Rate Policy](#). All cap rates used in an appeal based on income analysis (including those provided in an appraisal) must be based on relevant current market data. Taxpayers can review the market data used to derive the valuation for commercial properties on our website: <https://www.cookcountyassessoril.gov/valuation-reports>.

All appeals for income-producing property shall include the following:

- **Photograph of the Subject Property.** See Rule 12 regarding photographs.

- **Completion of RPIE in SmartFile.** RPIE is built into SmartFile as the Income and Expense tabs; there is no longer any separate RPIE filing process or RPIE codes. Incomplete or inaccurate data entry in SmartFile may be grounds for a “no change” result for any appeal of an income-producing property. Please see the “Appeal Guidelines” or review the video for the “Annual Appeals Rules Meeting” for more information, guidance, and instructions on completing the RPIE process. Both are found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor>.
- **IRS Tax Schedule Forms for the Prior Three Years.** Filers must provide IRS tax schedules, or other audited/certified financial statements, for the three years prior to the lien date (January 1) of the appeal year. Such forms may include, but are not limited to: Schedule E of the taxpayer 1040, IRS Form 8825, IRS Form 1065, and IL-990-T. Please See Rule 2 regarding redaction of NPPI from these forms. If taxpayer has not owned or operated the property for the prior three years, please explain the circumstances by using the Attestation, which can be found online at <https://www.cookcountyassessoril.gov/forms>.
- **Leases.** For all income-producing properties, except apartment buildings with more than 6 units, the taxpayer must provide either complete copies of all leases in place at the property or, alternatively, detailed summaries for each lease in place. The lease summaries must describe the parties to the lease, whether the lease is net, gross, or modified gross, square footage of the leased space, total number of units leased, rental rates, and the identity of the party(ies) responsible for paying the property taxes and their proportionate share. Additionally, the taxpayer must file an affidavit attesting to any relationship (other than landlord and tenant) between the parties to all leases in place at the subject property.

## Rule 17

**Condominium and Townhome Appeals, Including Common Area.** All appeals filed on behalf of a Condominium or Townhome Association must include a copy of the Declaration or most recent Amendment which sets forth the percentage of ownership for each unit. This is a requirement whether the argument is based on correction of the percentage of ownership for any unit(s), or whether it is based on a valuation reduction for the entire building and/or complex.

- **Sales Analysis.** Most arguments for the reduction in value of condominium buildings or townhome communities are based on in-building sales analysis. The in-building sales should be both recent (within 2 years of the lien date of the appeal year) and arm’s length for fair market value. If no units in the building have recently sold, choose sales “comps” in the manner explained in Rule 15. This Rule does not prohibit the use of other appropriate valuation arguments for these types of properties, such as appraised value or recent unit sale/purchase price.

- **Unit Characteristics – Data Collection.** Filers are encouraged to provide the characteristics of each unit, including square footage and total number of rooms, breaking down the number of bedrooms, bathrooms, and half baths. This is for data collection purposes so the CCAO can improve its assessment of these types of properties.
- **Common Area Arguments.** An appeal asserting that property should be declared as common area per 35 ILCS 200/10-35 shall include the recorded condominium declaration(s) or amendment(s) which designates the property as common area, along with the recorded deed showing that the common area is separately owned. Other documents, such as relevant plats or an affidavit of use, can also be used as further evidence showing that the property in question is common area, but do not replace the need for the declaration (or relevant amendment) and deed.

## Rule 18

**Land Valuation, Classification, and Demolition.** Generally, the CCAO values land at market value, per square foot. If filer believes their land is not valued correctly, filer can use “comps” analysis (see Rule 15), purchase/sale analysis (see Rule 13), appraisal value (see Rule 14), or other appropriate valuation methods for real estate. Other possible reasons for appeal of land valuation include, but are not limited to, the following:

- **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 the CCAO’s land square footage calculations match County records. If the CCAO’s calculations match County records, then the CCAO cannot grant a reduction in land square footage. Please see the “Appeal Guidelines” or review the video for the “Annual Appeals Rules Meeting” for more information on resolving land square footage issues. Both are found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor>. Generally, both a survey and the legal description of the property are useful in resolving land SF issues.
- **Farmland.** To see the requirements and instructions for having land valued as farmland, please see the CCAO’s website at <https://www.cookcountyassessoril.gov/farms>.
- **Excess Land.** Appeals based on excess vacant land must explain the location and dimensions of the vacant land. These appeals must be supported by a plat of survey detailing the dimensions and locations of all buildings, parking areas, or other improvements, along with any unimproved areas, storage areas, and ingress and egress. Additionally, photographs (see Rule 12) of the land claimed as excess must be submitted.
- **Unimproved Land Due to Demolition - General.** Filers must provide the following if requesting unimproved land classification due to demolition:

- Demolition Permit. The demolition permit must show its date of issuance.
- Payment. Filer must submit evidence of the payment for the demolition.
- Affidavit. An affidavit stating the date of the demolition. The CCAO provides a form Demolition Affidavit, which can be found online at <https://www.cookcountyassessoril.gov/forms>.
- Photographs. In addition to following the requirements for photographs found in Rule 12, the photographs must show the property prior to demolition, during the demolition, and post demolition.
- Completed General Affidavit Form. As applicable, use the General Affidavit form, found online at <https://www.cookcountyassessoril.gov/forms>, to provide any additional information regarding the demolition that filer wishes for the CCAO to review.
- **Unimproved Land Due to Commercial and Industrial Demolition**. In addition to the above-named documentation for demolition, please see the CCAO's Policy Governing Demolition and Qualification for Unimproved Real Estate (1-00 Class) for further information and requirements regarding appeals for the demolition of commercial and industrial buildings. This policy is found on the CCAO's website at <https://www.cookcountyassessoril.gov/demolition-and-unimproved-real-estate-valuation-policy>.
- **Note as to Flood Plain and FEMA Maps**: The CCAO already incorporates FEMA Flood Plain maps into its land valuations, so appeals based on this reason are generally unnecessary.

**Rule 19** Ongoing Construction. Filers should review the CCAO's Policy Regarding Properties Under Construction for information and instructions regarding appeals based on ongoing construction. This policy is found on the CCAO's website at <https://www.cookcountyassessoril.gov/commercial-properties-under-construction-valuation-policy>.

**Rule 20** Vacancy. There is no specific basis under applicable laws in Illinois and Cook County for reductions in assessed valuation due to vacancy. Therefore, filers must first review the CCAO's Vacancy Policy prior to filing any appeal based on vacancy, which is found online at <https://www.cookcountyassessoril.gov/assessors-vacancy-policy>. Generally, vacancy may be casualty related, market related, or due to building renovation. The CCAO will only grant 24 months of assessment reduction due to vacancy.

**A. Taxpayers who assert their property meets the conditions described by the CCAO's Vacancy Policy must file the following documents regardless of vacancy type:**

- **Completed Vacancy/Occupancy Affidavit.** The CCAO provides a Vacancy/Occupancy Affidavit, found online at <https://www.cookcountyassessoril.gov/forms>. (Occupancy shall include all space actually occupied or for which rent is being paid or is payable, even though the space may actually be vacant). It is highly recommended that filers use this form; however, an affidavit which includes the same information requested by the Vacancy/Occupancy Affidavit may also be used.
- **Required Vacancy Affidavit Information.** The total square footage or number of units which are vacant; the reason(s) for the vacancy; duration of the vacancy; and a description of the attempts to lease the vacant space. If no attempts were made to lease the vacant space, provide the reason(s), such as the property is instead listed for sale, currently undergoing rehabilitation and/or construction, or undergoing Eviction proceedings in Court.
- **Photographs of both the Interior and Exterior of the Building.** All photographs must follow the requirements set forth in Rule 12. The interior and exterior photographs should fully document the vacancy for the term in which the vacancy is requested.
- **Income and Expense Documentation.** If the property fits the definition of an income producing property under Rule 16 (or would fit the definition but for the vacancy), provide the documents required by Rule 16.
- **Completed General Affidavit Form.** As applicable, use the General Affidavit form, found online at <https://www.cookcountyassessoril.gov/forms>, to provide any additional information regarding the vacancy that filer wishes for the CCAO to review.

**B. Types of Vacancy and Additional Documentation Required:**

- **Casualty Related Vacancy.** This type of vacancy may relate to either residential or income producing properties. Casualty events include natural disasters, fire damage, and flooding. In addition to the above referenced documents in Part A, required supporting evidence includes but is not limited to: reports detailing the damage (such as from the Fire Department or a Building Inspector), and insurance claim information. Please see the CCAO's [Vacancy Policy](#) for additional guidance and requirements.
- **Market Related Vacancy.** This type of vacancy is related to income producing properties and occurs when there is higher than market

vacancy for the property. In addition to the above referenced documents in Part A, required supporting evidence includes but is not limited to: completed rent roll for the preceding 12 months, leases (if any), and proof that the vacant space is being marketed for lease or sale, such as a listing agreement. Please see the CCAO's Vacancy Policy for additional guidance and requirements.

- **Renovation Related Vacancy.** This type of vacancy is related to income producing properties and occurs when building renovation is necessary to attract sufficient tenancy. In addition to the above referenced documents in Part A, required supporting evidence includes but is not limited to: contractor's statements which include the general contractor's contact information, permits, and an estimated construction timeline. Please see the CCAO's Vacancy Policy for additional guidance and requirements.

All evidence relating to vacancy should be uploaded using the Vacancy Documents button in SmartFile.

Please note: The CCAO does not conduct property inspections to verify vacancy/occupancy information except in very limited circumstances. Therefore, filers should provide the above requested information with their appeal rather than simply filling out a "field check" request.

## **CLASS CHANGE REQUESTS**

### **Rule 21**

**Filings for Class Changes.** If a class change is requested, filer must clearly state so in their appeal brief and provide sufficient evidence in support of the class change. Please see the list of class codes on the CCAO's website <https://www.cookcountyassessoril.gov/classifications-real-property> for additional guidance regarding property classifications.

- **Recommendation for Class Change Appeals.** The CCAO highly recommends that filers who are requesting a class change concentrate on the class change argument. If filer desires further reductions in valuation after the implementation of a class change, filer may always proceed with further appeal at the Board of Review, or via the Certificate of Error process.
- **Class Changes within Class 2.** The Class 2 designation is typically for residential properties but may also include other properties which have a 10% level of assessment. Supporting documentation should include the following:
  - **Photographs.** Dated, color photographs which fully document the interior and exterior of the building. See Rule 12 regarding photographs.
  - **Building Details.** Filer must submit floor plans, survey, appraisal, or other similar documentation showing an accurate description of the building, its square footage, and its current usage.

- Breakdown by Room. Filer must submit information showing the total number of rooms, broken down by number of bedrooms, bathrooms, and half-baths.
- Specific to Class Change Requests to 2-11. In addition to the above documentation, filer should also provide evidence that each unit is actually used for residential purposes, has a separate entrance, separate mailbox, and separate utility meters. Copies of current leases and detailed rent rolls, if any, are recommended.
- **Class 5 to Class 2-12**. Class 2-12 is a building put to both commercial and residential use, of six or less units, where the building measures less than 20,000 square feet of above grade space, any age. To qualify for Class 2-12: (1) The non-residential portion of the building must be commercial rather than industrial; (2) the residential unit(s) are/have actually been used for residential purposes; and (3) The residential unit(s) are zoned for residential use – either legally conforming or legally non-conforming. Supporting documentation should include the following:
  - Photographs. Dated, color photographs which fully document the interior and exterior of the building. See Rule 12 regarding photographs.
  - Building Details. Filer must submit floor plans, survey, appraisal, or other similar documentation showing an accurate description of the building, its square footage, and its current usage. Information for both the residential and commercial portions of the building should be included.
  - Residential Portion. Filer must provide evidence that each unit is actually used for residential purposes, has a separate entrance (not one within an enclosed entrance vestibule of a commercial space), separate mailbox, and separate utility meters.
  - Breakdown by Room for Residential Portion. Filer must submit information showing the total number of rooms, broken down by number of bedrooms, bathrooms, and half-baths.
  - Residential Zoning. Filer must provide evidence that the residential units are zoned for residential use – either legally conforming or legally non-conforming.
  - Leases and Current Rent Rolls. Filer must submit current leases and/or current detailed rent rolls showing that the building is used for both residential and commercial purposes. If a residential unit is currently vacant, provide evidence showing that it is normally used for habitation, such as prior leases, prior rent rolls, and advertisements/listing agreements showing that the unit is currently for lease.

- **Class 5 to Class 3-18.** Class 3-18 is defined as 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).
- Photographs. Dated, color photographs which fully document the interior and exterior of the building. See Rule 12 regarding photographs.
- Building Details. Filer must submit floor plans, survey, appraisal, or other similar documentation showing an accurate description of the building, its square footage, and its current usage. This documentation must also include accurate square footage for both the residential and commercial portion of the building.
- Residential Zoning. Filer must provide evidence that the residential units are zoned for residential use – either legally conforming or legally non-conforming.
- Leases and Current Rent Rolls. Filer must submit current leases and/or current detailed rent rolls showing that the building is used for both residential and commercial purposes. If a residential unit is currently vacant, provide evidence showing that it is normally used for habitation, such as prior leases, prior rent rolls, and advertisements/listing agreements showing that the unit is currently for lease.
- Income and Expense. Filer must submit income information as specified in Rule 16.
- Residential Unit Characteristics – Data Collection. Filers are encouraged to provide the characteristics of each residential unit, including square footage and total number of rooms, breaking down the number of bedrooms, bathrooms, and half baths. This is for data collection purposes so the CCAO can improve its assessment of these types of properties.
- **Class 4 Requests.** Class 4 (20% level of assessment) is real estate owned and exclusively used by a not-for-profit organization in furtherance of the purposes set forth in its charter. Please see the CCAO's website at <https://www.cookcountyassessoril.gov/not-profit> for the Class 4 eligibility bulletin, filing requirements, and the CCAO's Not-for-Profit Affidavit form.
- **Other Class Change Requests for Non-Incentive Classes.**

- Photographs. Dated, color photographs which fully document the interior and exterior of the building. See Rule 12 regarding photographs.
- Building Details. Filer must submit floor plans, survey, appraisal, or other similar documentation showing an accurate description of the building, its square footage, and its current usage. This documentation must also include accurate square footage for both the residential and commercial portion of the building, if applicable.
- Income Producing Property. If the property is income producing per Rule 16, provide all documentation as required by Rule 16.
- Residential Zoning and Split Code Properties. Filer must provide evidence that the residential units, if any, are zoned for residential use – either legally conforming or legally non-conforming.

Other Documentation as Needed. The CCAO strongly recommends that filer provide any and all other documentation and information which support the specifics of the requested class change.

- **Class Changes to an Incentive Class**. Please review the CCAO's website at <https://www.cookcountyassessoril.gov/incentives-special-properties> for information regarding incentive classes, including eligibility, application filing, and appeal filing. Obtaining an incentive class is more complex and requires more documentation than other class changes.
- **AHSAP (Affordable Housing Special Assessment Program) and LIHTC (Low-Income Housing Tax Credit) Valuation Program**. Please review the CCAO's website at <https://www.cookcountyassessoril.gov/affordable-housing> for information regarding AHSAP and LHTIC eligibility, application, and appeal filing.

## **OMITTED ASSESSMENTS**

**Rule 22** **Omitted Assessments**. Section 9-260(a) of the Property Tax Code authorizes the CCAO to assess taxable property which was omitted from the tax rolls. Typically omitted assessments are issued for properties which were formerly property tax exempt, have new construction, or have improvements which were previously omitted from the tax rolls. Illinois law limits omitted assessments to the current assessment (warrant) year and 3 years prior. Please see the CCAO's website at <https://www.cookcountyassessoril.gov/omitted-assessment-appeals> for additional information, plus the Property Tax Code at Sections 9-260 through 9-270.

- **Data Collection**. Prior to sending out a Notice of Omitted Assessment, a member of our data collection team creates a new property record card for

the subject property. The assessed valuation is based on the findings from our data collection team.

- **Notice of Omitted Assessments.** Notices of Omitted Assessments are sent to the address for the taxpayer as discoverable through a search of public records. Typically, this will be the taxpayer “mail tax bills to” (or the like) address shown on the most recent deed. The notices show the deadline for appeal filing.
- **When to Appeal.** Omitted assessments must be appealed in the warrant year that they are issued. Our omitted assessment notices show the appeal deadline. Any appeals which are filed after the deadline must be submitted as requests for Certificates of Error.
- **Appeal Filing.** When filing an appeal for omitted assessments, select “OM” as a type/category in SmartFile for the relevant omitted tax years.
- **Supporting Documentation.** The required supporting documentation for an assessment reduction for an omitted assessment are the same as those for appeals of current year assessments. Please also see the CCAO’s website at <https://www.cookcountyassessoril.gov/omitted-assessment-appeals> for omitted assessment appeal documents.
- **Taxpayer Defenses to Omitted Assessments.** Section 9-270 of the Property Tax Code provides 7 potential defenses to an omitted assessment. Please review the statute prior to filing a defense to an omitted assessment, and please provide appropriate documentation to support any defense argument.
- **Note Regarding the *Bona Fide Purchaser Defense.*** A *bona fide* purchaser is one who purchases an interest for value without notice of the tax. Notice may be actual, or constructive. Generally, those who purchase a formerly property tax exempt property or new construction are charged with constructive notice of the tax.

## **PROPERTY TAX EXEMPT (NON-HOMESTEAD EXEMPTIONS) PROPERTIES**

### **Rule 23**

**Property Tax Exempt Properties (Non-Homestead Exemptions).** The Illinois Department of Revenue (IDOR) is the entity which determines whether or not a property is property tax exempt. The CCAO cannot consider a property as property tax exempt absent the IDOR determination.

- **Generally.** If the Illinois Department of Revenue (IDOR) has issued a letter indicating that a property is partially or fully exempt from assessment, property owners or their agents should email a copy of the IDOR letter and

the property's recorded deed to [Assessor.Exempt@cookcountyil.gov](mailto:Assessor.Exempt@cookcountyil.gov). **An appeal complaint is not required.**

- **Partial Exemptions – Valuation Appeals.** Supporting documentation for an assessment reduction on properties which are partially exempt are the same as those for appeals of current year assessments.
- **Taxable Leaseholds.** Please make sure our Exempt Team has the most current version of the lease for any taxable leasehold. 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 version of the lease.
- **Taxable Leaseholds – Valuation Appeals.** Provide the most current version 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.
- **Note as to Certificates of Error for Non-Homestead Exemptions.** The Property Tax Code at Section 14-25 governs Certificates of Error for property tax exempt properties. Certificates of Error for these properties can be submitted for up to 3 tax years prior to the date of the IDOR determination letter.

## **RE-REVIEWS, CORRECTIONS OF FACTUAL ERRORS, AND CERTIFICATES OF ERROR**

**Rule 24** **No Appeal Re-Reviews**. The CCAO does not provide re-reviews of its assessment appeals. If taxpayer does not agree with an assessment appeal decision by the CCAO regarding the valuation of their property, taxpayer may file a further assessment appeal with the Cook County Board of Review. Please see the Board's website at <https://www.cookcountyboardofreview.com/> for further information.

Please note that the above prohibition of re-reviews does not limit the statutory authority of the Assessor to correct errors through the Certificate of Error (35 ILCS 200/14-15) or Certificate of Correction (35 ILCS 200/14-10) processes, nor does it prevent the CCAO from submitting an Assessor's Recommendation to the Board of Review.

**Rule 25** **Corrections of Factual Errors – Methods**. If taxpayer reasonably believes that the CCAO has made a factual error in the assessment of the property (such as in square footage, building characteristics, PIN prorations, property classification, keypunch or transcription errors, or other errors in assessment due to reasons other than a mere difference of opinion in valuation), then taxpayer or their authorized representative is encouraged to contact the CCAO regarding the error, even outside of the current year appeal process. The following methods may be used:

- **“Contact Us” Page.** Submit the request for correction to our “Contact Us” Page, found on our website at <https://www.cookcountyassessoril.gov/contact>.
- **Email.** Submit the request for correction, along with supporting documentation, to [assessor.onlineappeals@cookcountyil.gov](mailto:assessor.onlineappeals@cookcountyil.gov).
- **In Person.** Taxpayers may bring their supporting documentation to our Taxpayer Resolutions Team, located at our downtown office only. However, taxpayers must do so during the CCAO’s normal business hours.
- **Mail.** Submit the request for correction, along with supporting documentation, by mailing to our downtown office address: Cook County Assessor’s Office, 118 North Clark Street, Room 320, Chicago IL 60602.
- **SmartFile:** Please note that SmartFile also has a function which allows a taxpayer to file an update to the residential property characteristics on a PIN when filing an appeal.
- **Documentation Required.** Taxpayer should provide any and all documentation which supports their request for correction. Please see Rules 12-21 for guidance on required supporting documentation.
- **Characteristics Changes and Valuation.** Please be advised that many characteristics changes do not result in a change in valuation. However, it is important that our records be accurate to improve the assessment process.
- **Timeline for Corrections of Factual Errors - Limitations.** The CCAO can not make corrections for factual errors once the current year assessments are certified to the Board of Review. Rather, the changes will have to be made for the next assessment year if it cannot be implemented by the certification date.

## Rule 26

**Property Location Correction.** If a taxpayer believes the Assessor’s record for a property has an incorrect property location address, the CCAO recommends that taxpayer or their authorized representative file an appeal requesting a change. However, the provisions in Rule 25: Corrections of Factual Errors-Methods, may also be used.

- **Generally.** The Assessor’s Office makes every effort to record an accurate property location address to comply with its duty to maintain accurate property records. However, it is the obligation of each municipality in Cook County to establish property addresses within its boundaries. Consequently, each taxpayer seeking a change must produce evidence supporting what they contend is the correct property location address.

- **Supporting Documentation.** Supporting documentation may include any of the following: deeds, GIS displays, plats of survey, title commitments, documentation from the municipality confirming the correct property address, and all other information validating a change of address.
- **Property Location Correction Form and SmartFile.** To file a property location correction appeal in SmartFile, please first complete the CCAO's Property Location Correction form at [PropertyLocation.pdf](#) and attach all supporting evidence to that form. Once in SmartFile, choose "Property Description Error" as the appeal reason. Then type in "Property Location Change" in the "Other Description" field.

You must indicate in your Appeal Narrative that you are requesting a Property Location Correction. To that end, you will then upload the Property Location Correction Form, along with all supporting documents, as a single pdf file with the file name "Property Location Correction + [insert PIN]" to the "General Affidavit" attachments category in SmartFile.

- **Timeline for Property Location Corrections - Limitations.** The CCAO can not make property location address changes once the current year assessments are certified to the Board of Review. Rather, the property location change will have to be made for the next assessment year if it cannot be implemented by the certification date.
- **Tax Bill Mailing Addresses.** The CCAO does not determine where tax bills are mailed; rather that is under the purview of the Cook County Treasurer's Office (CCTO). If taxpayer needs to update the mailing address for a tax bill, please visit the CCTO's website at <https://www.cookcountypropertyinfo.com/> to make the change online.

## Rule 27

**Certificates of Error.** Section 14-15 of the Property Tax Code governs the Certificate of Error (CofE) process in Cook County. CofEs may be initiated internally by the CCAO, or taxpayers and their authorized representatives may file requests for the issuances of CofEs using the process outlined below. CofEs may be filed for any reason that a current year assessment appeal may be filed.

Please see the "Appeal Guidelines" and "Annual Appeals Rules Meeting" video found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor> for more information and guidance on the valuation CofE processes, filing, and timelines.

As with current year valuation appeals, please be advised that the filing of a CofE request does not guarantee that a decision in favor of a reduction in valuation will be granted by the CCAO.

See <https://www.cookcountyassessoril.gov/exemptions> for the CofE filing process for homestead exemptions, which is a separate process from valuation-based CofEs filed under Appeal Rule 27.

- **Filing CofEs with Current Year Appeal.** The CCAO highly recommends that CofE requests be filed with a current year assessment appeal, via SmartFile. This makes your CofE request easier to track. You can track a CofE filing online by clicking the “big blue button” at the bottom of the page on your PIN search to navigate to the Property Records search. Be sure to select the tax year in which you filed the request.
- **Filing CofEs Outside of Current Year Appeal.** Taxpayers may also file valuation CofEs at any time outside of the current year appeal process, by emailing the CofE application and supporting documentation to [assessor.onlineappeals@cookcountyil.gov](mailto:assessor.onlineappeals@cookcountyil.gov). These filings must include “Prior Year Only Certificate of Error” in the email subject line. Please note that these filings typically cannot be added to our system until after the current assessment year appeals process has ended; therefore, these CofEs are more difficult to track.
- **Documentation Required for CofE Requests.**
  - Completed Certificate of Error Application. Our Certificate of Error Application can be found on our website at <https://www.cookcountyassessoril.gov/form-document/taxable-property-certificate-error>.
  - Authorization Form. If a CofE is being filed by an authorized representative on behalf of a taxpayer, a completed [Authorization Form](#) must also be submitted. The [Authorization Form](#) is found on our website at <https://www.cookcountyassessoril.gov/forms>.
  - Supporting Documentation. The rules for CofE filing are the same as the rules for the filing of current year appeals. Therefore, documentation submitted in support of a CofE is the same as the documentation required for any current year appeal. Failure to provide supporting documentation may result in the denial of a CofE request.
  - Note as to PTAB Decisions and Industrial/Commercial Properties. Per Section 16-185 of the Property Tax Code, PTAB decisions do not automatically apply to the remainder of the triennial for industrial/commercial properties. Therefore, be sure to bolster CofE filings for industrial/commercial properties with additional supporting documentation, rather than just a copy of the PTAB order.
- **Timeline for Issuance of CofE Grants.** The CCAO may only issue CofE grants per the provisions of the Property Tax Code at Section 14-15. No CofE grants can be issued once the requested tax year is closed, even if the CofE request was filed before the close of the tax year in question. The CCAO makes every effort to review all CofE requests in order of receipt and prior to the tax year closing deadline.

- **No CofE Re-Reviews.** The CCAO does not provide re-reviews of its CofE decisions; therefore, the CCAO requires that taxpayer provide all supporting documentation in support of CofE at initial filing. Please see Rule 25 on methods to request the correction of factual errors.

**CofEs and Tax Years Pending at PTAB or Circuit Court.** The operations of the Property Tax Code generally prohibit filing both a CofE and further appeal at PTAB or Circuit Court for the same tax year. Please see the “Appeal Guidelines” and “Annual Appeal Rules Meeting” video found online at <https://www.cookcountyassessoril.gov/official-appeal-rules-cook-county-assessor> for more information. These Rules shall be effective as of the date of adoption by the Cook County Assessor.