



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

APPELLANT: OGK II  
DOCKET NO.: 21-58869.001-R-1  
PARCEL NO.: 31-02-201-035-0000

The parties of record before the Property Tax Appeal Board are OGK II, the appellant(s), by attorney Glenn Guttman, of Rieff Schramm Kanter & Guttman in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds no change in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$7,139  
**IMPR.:** \$33,442  
**TOTAL:** \$40,581

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant filed a timely appeal from a decision of the Cook County Board of Review pursuant to Section 16-160 of the Property Tax Code (*35 ILCS 200/16-160*) challenging the assessment for the 2021 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

**Findings of Fact**

The subject property is improved with a 42-year-old, three-story, building of masonry construction. It contains 6,429 square feet of gross building area. Features of the subject include a slab foundation. The property is situated on 13,599 square feet of land in Rich Township, Cook County. It is a Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three suggested comparable sales. One of these sold in 2019; the remaining two sold in 2017, four years prior to the instant 2021 lien year. The appellant also

submitted a copy of the Board's decision in docket number 20-49233, wherein the Board found a reduction of assessment for the subject property.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$40,581. The subject's assessment reflects a market value of \$405,581, or \$63.12 per square foot of living area including land, when applying the 2021 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment, the board of review submitted information on three suggested comparable sale properties. Two of these properties contained the same 6,429 square feet of living space as the subject property. One was sold in the 2021 lien year; the other was sold in 2018, three years prior to the lien year.

In its rebuttal brief, the appellant argued the board of review's suggested comparable properties #1 and #2 should be given no weight because they were part of a bulk sale. The appellant submitted a PTAX-203 tax declaration that, it claims, disclosed this bulk sale. The tax declaration disclosed only the board of review's comparable #1, PIN 032. The appellant also submitted a two-page CoStar report that comparables #1 and #2 had been sold in a bulk sale in 2018. The appellant also submitted a PTAX-203 that disclosed comparable #3 is a single family residence. The appellant reaffirmed the request for an assessment reduction.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. *86 Ill.Admin.Code §1910.63(e)*. Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. *86 Ill.Admin.Code §1910.65(c)*. The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board gives no weight to its 2020 decision, cited by the appellant. The Board is not bound by its prior decisions since each is fact specific and based upon the record of each case. See *Board of Education of Ridgeland School District No. 122 v. Property Tax Appeal Board*, 2012 IL App (1<sup>st</sup>) 110461, ¶33.

The appellant's rebuttal brief considers the board of review's comparable properties #1 and #2 were sold in bulk. However, the board of review's evidence disclosed its comparable property #1 was sold in 2021. Comparable property #2 was sold in 2018 in, according to the rebuttal evidence, a bulk sale.

The appellant's three suggested comparable properties sold in 2017, 2019 and 2017, respectively.

The Board finds the best evidence of market value to be the board of review comparable sale(s) #1. This comparable property sold in 2021, the same lien year as the instant appeal, for \$76.99 per square foot of living area, including land. It contains 6,429 square feet of living area and a

slab foundation, the same as the subject property. It is on the same block as the subject property. The subject's assessment reflects a market value of \$63.12 per square foot of living area including land, which is below the best comparable sale in this record. Based on this evidence, the Board finds a reduction in the subject's assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: \_\_\_\_\_

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date:

April 21, 2026



Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, **YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS.** A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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