



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

APPELLANT: Oak Terrace Building Association
DOCKET NO.: 22-30719.001-R-3 through 22-30719.024-R-3
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Oak Terrace Building Association, the appellant(s), by attorney Herbert B. Rosenberg, of RDM Law Group in Deerfield; the Cook County Board of Review; the C.C.S.D. #59, and Twp. H.S.D. #214, intervenors, by attorney Ares G. Dalianis of Franczek P.C. in Chicago.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
22-30719.001-R-3	08-23-201-046-0000	4,112	43,538	\$47,650
22-30719.002-R-3	08-23-201-047-0000	4,110	43,538	\$47,648
22-30719.003-R-3	08-23-201-048-0000	3,696	43,538	\$47,234
22-30719.004-R-3	08-23-201-049-0000	4,115	43,538	\$47,653
22-30719.005-R-3	08-23-201-052-0000	4,112	43,538	\$47,650
22-30719.006-R-3	08-23-201-053-0000	4,126	43,538	\$47,664
22-30719.007-R-3	08-23-201-054-0000	3,686	43,538	\$47,224
22-30719.008-R-3	08-23-201-055-0000	4,114	43,538	\$47,652
22-30719.009-R-3	08-23-201-056-0000	4,107	43,538	\$47,645
22-30719.010-R-3	08-23-201-058-0000	4,109	43,538	\$47,647
22-30719.011-R-3	08-23-201-059-0000	1	0	\$1
22-30719.012-R-3	08-23-201-061-0000	3,957	43,538	\$47,495
22-30719.013-R-3	08-23-201-062-0000	4,442	43,538	\$47,980
22-30719.014-R-3	08-23-201-063-0000	4,442	43,538	\$47,980
22-30719.015-R-3	08-23-201-065-0000	4,442	43,538	\$47,980
22-30719.016-R-3	08-23-201-069-0000	4,442	51,407	\$55,849
22-30719.017-R-3	08-23-201-070-0000	3,957	43,538	\$47,495
22-30719.018-R-3	08-23-201-071-0000	4,442	43,538	\$47,980
22-30719.019-R-3	08-23-201-072-0000	4,442	53,051	\$57,493
22-30719.020-R-3	08-23-201-073-0000	3,957	53,051	\$57,008
22-30719.021-R-3	08-23-201-074-0000	4,442	43,538	\$47,980
22-30719.022-R-3	08-23-201-076-0000	3,957	43,538	\$47,495
22-30719.023-R-3	08-23-201-077-0000	4,442	43,538	\$47,980
22-30719.024-R-3	08-23-201-078-0000	1	1	\$2

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2022 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 properties consist of multiple parcels comprising a total of 333,102 square feet of land improved with twenty-two multi-unit residential buildings within the Oak Terrace Building Association. The residential buildings are approximately 44-year-old, have masonry construction and range in size from 4,050 to 4,935 square feet of living area. The properties are located in Mount Prospect, Elk Grove Township, Cook County and are classified as class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on eight equity comparables with varying degrees of similarity to the subject property. The suggested comparable properties range in size from 5,686 to 6,210 square feet of living area and range in age from 45 to 49 years old. The appellant reported that three of the suggested comparables were located in the same neighborhood code as the subject and five suggested comparables were located in different neighborhood codes but did not provide their proximity to the subject property. The comparables have improvement assessments ranging from \$7.20 to \$8.46 per square foot of living area. The appellant submitted a board of review decision letter indicating the total assessment for the subject property was \$1,222,988. The appellant disclosed that the subject improvements have assessments ranging from \$10.95 to \$13.06 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's total assessment to \$805,991.

The board of review submitted its "Board of Review Notes on Appeal" disclosing a total assessment for one building within the property to be \$55,000. This property has an improvement assessment of \$50,888 or \$12.56 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables. The suggested comparable properties all have 4,050 square feet of living area. The board of review reported that each of the suggested comparables was located within a block of the subject property and ranged in age from 44 to 45 years old. The comparables have improvement assessments ranging from \$12.57 to \$13.06 per square foot of living area. Three of the suggested comparables are the same buildings that are the subject of this appeal. Based on this evidence, the board of review requested that the assessment be confirmed.

Community Consolidated School District #59 and Township High School District #214 (hereinafter, "Intervenor") intervened in this appeal. In support of its contention to affirm the assessment, Intervenor submitted a brief and copies of thirteen trustee or warranty deeds for sales of dwellings within the subject properties. The sales occurred between August 2018 and June 2023 and had prices that ranged from \$505,000 to \$2,650,000. All of the sales were for

properties within the Oak Terrace Building Association. Two of the sales involved multiple properties.

In Rebuttal, the appellant submitted correspondence arguing that the equity comparables submitted by the board of review were all part of appellant's building association (Oak Terrace Building Association). The appellant indicated that three of the board of review's comparables were also subjects of this appeal and the fourth comparable was being appealed in a separate appeal. The appellant argues that the Board should not consider these comparables because they are within the appellant's building association and all have assessments that are being appealed before the Board. The appellant argues that the intervenor has submitted market value evidence that fails to address their lack of uniformity argument and should be given no weight.

A consolidated hearing was held in Docket Nos. 22-30719.001-R-3, 22-30735.001-R-3 and 22-30749.001-R-3 although separate decisions will be issued. (86 Ill.Admin.Code §1910.78) This matter proceeded to hearing on July 16, 2026, conducted remotely via the Webex platform pursuant to Section 1910.67 of the Administrative Code.

At the hearing, the appellant argued that the basis of the appeal is assessment equity and appellant's comparables are from three different building associations with an assessment range of \$7.32 to \$8.45 per square foot of livable area whereas the average assessment of the subject properties was \$12.35 per square foot of livable area. Based on this the appellant argues for a reduction in assessment.

The intervenor argued that the best evidence of value is a recent sale of a subject property. The intervenor argued that the thirteen sales that were produced show that the market value is at or above the assessment value of the properties under appeal.

The board of review adopted the arguments of the intervenor and rested on the written evidence submitted.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of assessment equity to be appellant's comparables #1, #2, and #6 through #8. Like the subject property, each of these comparables has a two-story, multi-family dwelling with a full or partial basement. The dwellings on these comparables are similar to the subject dwelling in age and living area size, though they are all larger than the subject property. In comparison, appellant's comparables #3 through #5 are over 2,000 square foot

larger in living area size than the subject property, are three-stories and they have slab foundations rather than a full or partial basement. The board of review's comparables are all located within the same building association as the appellant and three are subjects of this appeal while one comparable is being appealed separately. Pursuant to Pace Realty Group, Inc. v. The Property Tax Appeal Board, 306 Ill.App.3rd. 718, 713 N.E.2d 1249, 239 Ill.Dec.339 (1999), the Appellate Court found that in determining what properties are truly comparable, it is an error as a matter of law when the selection of comparables includes a property which has also received the same contested assessment. Therefore, the board of review's comparables are given no weight as they are within the same association as the subject properties and their assessments have also been appealed.

The intervenor's evidence is given no weight as it fails to address appellant's lack of uniformity argument but rather addresses market value. 86 Ill.Admin.Code §1910.50(a).

The best comparables have improvement assessments that range from \$7.30 to \$8.46 per square foot of living area. The average subject improvement assessment of \$12.35 per square foot of living area is above the range established by the best comparables in this record. The Board notes that the best comparables are all larger than the subject property and appraisal/assessment theory reveals the larger the building square footage the lower the price per square foot will be. Therefore, the Board finds the subject buildings should be above the range of these comparables. After considering all the comparable properties with emphasis on the similarity of features, and location to the subject property and after further considering adjustments to these comparable properties for differences from the subject in size, the Board finds the subject's improvement assessment is not supported and a reduction in the improvement is 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: _____

October 20, 2026



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

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

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-215 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

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

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

PARTIES OF RECORD

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