



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

APPELLANT: 8208 O'Connor, LLC
DOCKET NO.: 22-33306.001-R-1
PARCEL NO.: 12-26-205-031-0000

The parties of record before the Property Tax Appeal Board are 8208 O'Connor, LLC, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd., 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: \$7,153
IMPR.: \$59,846
TOTAL: \$66,999

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 property consists of a two-story multi-family apartment building of masonry exterior construction with 5,807 square feet of gross building area and which is approximately 53 years old.¹ Features include a full basement, and 6 full bathrooms. The property has a 6,813 square foot site and is located in River Grove, Leyden Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables located in the neighborhood code "81" which is the same as the subject along with

¹ All descriptive details have been drawn from the appellant's submission. The board of review presented the "subject" with a different parcel number and address than that of the property on appeal.

property characteristics sheets for four of the properties which were used to correct story height information of these properties. The comparables consist of class 2-11 two-story or three-story buildings of masonry exterior construction that are 46 to 54 years old. The buildings range in size from 6,003 to 6,240 square feet of gross building area. Each comparable has a full basement, 6 or 6½ bathrooms, and comparable #2 has a two-car garage. The comparables have improvement assessments ranging from \$46,478 to \$58,703 or from \$7.45 to \$9.71 per square foot of gross building area. Based on this evidence, the appellant requested a reduced improvement assessment of \$55,805 or \$9.61 per square foot of gross building area representing the “median” of the comparables presented according to the appellant.

The board of review submitted its “Board of Review Notes on Appeal” presenting the “subject” as parcel number 12-25-219-045-0000 located at 2905 N. 74th Ct., in Elmwood Park. The appellant submitted a copy of the final decision disclosing the total assessment for the subject of \$66,999. The subject property has an improvement assessment of \$59,846 or \$10.31 per square foot of gross building area.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located in neighborhood code “81.” The comparables consist of class 2-11 two-story or three-story buildings of masonry exterior construction which are each 56 years old. The buildings contain either 4,200 or 4,704 square feet of gross building area. Each comparable has a full basement and 6 full bathrooms. Comparable #1 has central air conditioning and two comparables have two-car and three-car garages, respectively. The comparables have improvement assessments ranging from \$55,846 to \$57,437 or from \$12.01 to \$13.68 per square foot of gross building area. Based on this evidence, the board of review requested confirmation of the subject’s assessment.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant’s comparable #2 along with board of review comparables #2 and #3, due to garage features when compared to the subject which does not have a garage. Similarly, the Board has given reduced weight to board of review comparable #1 for its air conditioning amenity which is not a feature of the subject.

Although none of the remaining comparables are similar to the subject in building size, nonetheless, the Board finds the best evidence of assessment equity on this record consists of appellant’s comparables #1, #3, #4 and #5. These four properties are each similar to the subject

in classification, exterior construction, foundation type and relatively similar to the subject in bathroom count. However, each of these buildings are larger than the subject apartment building. These four comparables have improvement assessments ranging from \$46,478 to \$58,703 or from \$7.45 to \$9.71 per square foot of gross building area. The subject has an improvement assessment of \$59,846 or \$10.31 per square foot of gross building area, which is above the range of the best comparables both in terms of overall improvement assessment and on a per-square-foot of building area basis. However, after considering appropriate adjustments to the comparables for differences in both age and building size when compared to the subject and recognizing the principle of the economies of scale, in which accepted real estate valuation theory provides that all factors being equal, as the size of the property increases, the per unit value decreases. In contrast, as the size of a property decreases, the per unit value increases. Thus, the Board finds the subject's slightly higher assessment is logical given the relative differences between the subject and the best comparables in this record.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

Based on this record and after considering appropriate adjustments to the best comparables in the record for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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:

August 19, 2025



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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