



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

APPELLANT: Patrick Cody  
DOCKET NO.: 23-20527.001-R-1  
PARCEL NO.: 16-06-412-001-0000

The parties of record before the Property Tax Appeal Board are Patrick Cody, 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:** \$14,118  
**IMPR.:** \$62,522  
**TOTAL:** \$76,640

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 2023 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 building of masonry exterior construction with 4,456 square feet of gross building area. The building is approximately 105 years old. Features of the building include a full basement with finished area,<sup>1</sup> a fireplace and a 2-car garage. The property has a site with 10,860 square feet of land area and is located in Oak Park, Oak Park 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 with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables that have the same assessment neighborhood code as the subject. The comparables

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<sup>1</sup> The appellant disclosed the subject's basement is finished with a recreation room, which was not refuted by nor was it reported by the board of review.

are class 2-11 properties that are improved with two-story or three-story multi-family buildings of masonry or stucco exterior construction ranging in size from 2,717 to 5,472 square feet of gross building area. The buildings are from 58 to 120 years old. Each comparable has a full basement with finished area and three comparables each have either a 2-car, a 2.5-car or a 3-car garage. The comparables have improvement assessments that range from \$32,264 to \$65,608 or from \$10.94 to \$12.44 per square foot of gross building area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment of \$53,427 or \$11.99 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$76,640. The subject property has an improvement assessment of \$62,522 or \$14.03 per square foot of gross building area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables that have the same assessment neighborhood code as the subject and within the subject's subarea. The comparables are class 2-11 properties that are improved with two-story multi-family buildings of frame, stucco or frame and masonry exterior construction ranging in size from 2,026 to 4,962 square feet of gross building area. The buildings are from 66 to 130 years old. Each comparable has a full or partial basement, one of which has finished area. One comparable has central air conditioning, two comparables each have two or three fireplaces and three comparables each have a 2-car garage. The comparables have improvement assessments that range from \$34,023 to \$86,896 or from \$15.82 to \$18.80 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 nine comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables #1, #2, #4 and #5, as well as board of review comparables #1, #3 and #4 due to their substantially smaller building sizes and/or newer ages, when compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparable #3 and board of review comparable #2, which are overall more similar to the subject in location, building size and age. However, the appellant's comparable #3 is a three-story design, when compared to the subject's two-story design and board of review comparable #2 has central air conditioning, unlike the subject, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables have improvement

assessments of \$65,608 and \$86,896 or \$11.99 and \$17.51 per square foot of gross building area, respectively. The subject's improvement assessment of \$62,522 or \$14.03 per square foot of gross building area falls below the two best comparables in the record in terms of overall improvement assessment and is bracketed by the comparables on a per square foot of gross building area basis. Based on this record and after considering adjustments to the best comparables for differences from 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:

May 19, 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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