



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

APPELLANT: Dorota Borchardt
DOCKET NO.: 23-29740.001-R-1
PARCEL NO.: 16-06-106-024-0000

The parties of record before the Property Tax Appeal Board are Dorota Borchardt, the appellant(s); and the Cook County Board of Review.

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:

LAND: \$12,429
IMPR.: \$37,571
TOTAL: \$50,000

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 an approximately 69-year-old, two-story, single-family dwelling of masonry construction with 1,872 square feet of living area. The property has an 8,150 square foot site and is located in Oak Park, Oak Park Township, Cook County. Features of the home include an unfinished full basement, one fireplace, central air conditioning, and a three-car garage. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance. The record reflects that the subject property is owner-occupied.

The appellant contends assessment inequity with regards to the subject improvement as the basis of the appeal. In support of this argument the appellant submitted information on twelve¹ equity comparables with varying degrees of similarity to the subject. The suggested comparable

¹ The appellant submitted comparable properties in three separate equity grids. The columns were numbered 1-13; however, only 12 comparable properties are listed for the Board's consideration.

properties ranged in size from 1,875 to 2,241 square feet of living area. Ten of the suggested comparable properties have at least one fireplace. Nine of the suggested properties have a full basement. Nine of the suggested comparables were listed as having central air conditioning. Each of the comparable properties had a garage, but no details were given as to the size of each garage. The appellant reported that the suggested comparables were located within a 0.7-mile radius from the subject property, all of which were within the same neighborhood code as the subject property. The comparables ranged in age from 71 to 97 years old. The comparables have improvement assessments ranging from \$19.55 to \$21.08 per square foot of living area. The appellant also submitted a supplemental data regarding their comparable properties including one photograph of each property. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$50,473.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$56,999. The subject property has an improvement assessment of \$44,571 or \$23.81 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 ranged in size from 1,253 to 1,688 square feet of living area. Two of the suggested comparable properties had at least one fireplace. Two comparable properties had a finished full basement, one comparable had an unfinished partial basement, and one comparable had a finished partial basement. Three of the suggested comparables were listed as having central air conditioning. The suggested comparables had either a one-car or a two-car garage. The board of review reported that two of the suggested comparables were located within a quarter of a mile of the subject property and two of the comparables was located within a block of the subject property. All the comparables were located within the same neighborhood code as the subject property. The comparables ranged in age from 70 to 76 years old. The comparables have improvement assessments ranging from \$24.04 to \$28.47 per square foot of living area. Based on the above evidence, the board of review requested that the assessment be confirmed.

In rebuttal, the appellant submitted a one-page letter dated December 17, 2024. The appellant contends that of the board of review's comparables, only comparable #2 has the same style of house (Colonial Revival) as that of the subject property. The appellant also notes that board of review's comparable #2 recently sold and that the sale price per square foot is lower than the assessed value per square foot.²

Prior to a scheduled June 11, 2025, hearing before a PTAB Administrative Law Judge the parties entered into a written agreement to waive hearing and have a decision rendered based on the previously submitted evidence.

Conclusion of Law

The taxpayer asserts assessment inequity as the basis of the appeal. The Illinois Constitution requires that real estate taxes, "be levied uniformly by valuation ascertained as the General Assembly shall provide by law." Ill. Const. art. IX, §4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). This uniformity provision of the Illinois Constitution does

² This evidence would best be construed as a comparable sale and not equity evidence. The only basis indicated in this appeal is equity so therefore the Board will not consider evidence of this recent sale in this decision.

not require absolute equality in taxation, however, and it is sufficient if the taxing authority achieves a reasonable degree of uniformity. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by the appellant by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof needed for a conviction of a crime. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). 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 #2, #7, and #9. Like the subject property, these comparables are class 2-05, single-family dwellings. These comparable properties had more similarly sized living areas, closer in age, and were located within a closer degree of proximity to the subject property.

The best evidence comparables ranged in improvement assessment of \$20.06 to \$21.08 per square foot of living area. The subject's improvement assessment of \$21.34 per square foot of living area falls above the range established by the best comparables in this record. After considering adjustments to these comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is not supported. Based on this record the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment 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 21, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Dorota Borchardt
1215 Oak Park Ave
Oak Park, IL 60302

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602