

**THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

BRIGHTON PARK NEIGHBORHOOD )  
COUNCIL, LOGAN SQUARE )  
NEIGHBORHOOD ASSOCIATION, and )  
SOUTH SUBURBAN HOUSING CENTER, )

Plaintiffs, )

v. )

FRITZ KAEGI, in his official capacity as the )  
Cook County Assessor; and COUNTY OF )  
COOK, a body politic and corporate, )

Defendants. )

No. 17 CH 16453

**AGREED ORDER OF DISMISSAL**

Plaintiffs Brighton Park Neighborhood Council (“BPNC”), Logan Square Neighborhood Association (“LSNA”), and South Suburban Housing Center (“SSHC”) (collectively “Plaintiffs”) and Fritz Kaegi, in his official capacity as the Cook County Assessor (“CCAO”), and County of Cook (collectively “Defendants”) jointly present the following Agreed Order of Dismissal as full and final resolution of this matter:

**Procedural History**

On December 14, 2017, BPNC and LSNA initiated this matter with a Complaint against then Cook County Assessor Joseph Berrios, in his official capacity, and County of Cook, alleging that the CCAO’s method of assessing residential properties in Cook County is racially and ethnically discriminatory and not uniform, in violation of the Illinois Civil Rights Act, the Equal Protection Clauses of the Illinois and United States Constitutions, the Uniformity Clause of the Illinois Constitution, and the federal Fair Housing Act.

On February 22, 2018, Defendants filed a motion to dismiss the complaint.

On March 3, 2018, Plaintiffs filed their First Amended Complaint (the "Complaint"), adding SSHC as a Plaintiff and advancing the same claims against Defendants as the original complaint.

On April 4, 2018, Defendants renewed their motion to dismiss the Complaint, which was fully briefed by the parties and upon which oral argument was held.

On or about December 3, 2018, Fritz Kaegi was sworn into office as the newly elected Cook County Assessor.

On February 7, 2019, the Court issued an order denying Defendants' motion to dismiss the Complaint as to Counts I (Illinois Civil Rights Act), V (Fair Housing Act), and VI (Indemnification) and granted it as to Counts II (Uniformity Violation under the Illinois Constitution), III (Equal Protection Violation under the Illinois Constitution), and IV (Equal Protection Violation under the United States Constitution). The Court also substituted Mr. Kaegi for Mr. Berrios as a Defendant by operation of law.

#### Recent Developments and Changes within the CCAO

Since Mr. Kaegi was sworn into office as Cook County Assessor on December 3, 2018, the following has occurred:

- Changes in Coefficient of Dispersion (COD), Price Related Differential (PRD), Price Related Bias (PRB), and median ratios are now calculated and recorded at each step of the residential valuation process. These performance statistics are reported and posted publicly the same day assessments are mailed to the tax payers and are accessible on the CCAO website at <http://www.cookcountyassessor.com/Resources/Valuation-Statistics.aspx>.
- The CCAO will be preparing triad and county-wide ratio studies annually within 45 days of the completion of an assessment cycle.

- In April of 2019 the CCAO released its underlying code as well as its assessment and modeling data to the public. The code and data can be accessed on the Cook County Open Data Portal and is free to download and use.
- Changes to the methods and code utilized to assess residential property will continue to be made available to the public throughout the Assessor's tenure.
- The CCAO has held events across the county and developed a public scheduling process that allows organizations, nonprofits, and other groups to request an outreach event and/or an event with the Assessor on the CCAO website. Assessor Kaegi also plans to implement a process when taxpayers may schedule a meeting with senior staff about assessments.
- The CCAO is committed to conducting outreach and engagement through the lens of racial equity and the CCAO communications and policy team is willing to discuss affordable housing issues in connection with such outreach.
- In May 2019, the International Association of Assessing Officers (IAAO) completed a comprehensive review of the CCAO. The review, requested by Assessor Kaegi, recognized the historic inequity in the assessment process as "a result of not being able to produce fair and uniform values that stand up to citizen appeals." The IAAO found that modernization and investment in technology, staffing, data quality and valuation methods are needed to "return to equity through a more fair and equitable assessment process."  
[https://www.cookcountyassessor.com/assets/forms/PCS\\_Cook-County\\_Report\\_final.pdf](https://www.cookcountyassessor.com/assets/forms/PCS_Cook-County_Report_final.pdf)
- On June 20, 2019, the Cook County Clerk, Karen Yarbrough, released the 2018 property tax rates and reported that equalized assessed value changes in the City of Chicago for tax year 2018 had contributed to "a shift of the tax burden away from the southern portion of

the City towards the central and northern portions of the City.”

[https://www.cookcountyclerk.com/sites/default/files/pdfs/2018%20Tax%20Rate%20Report\\_1.pdf](https://www.cookcountyclerk.com/sites/default/files/pdfs/2018%20Tax%20Rate%20Report_1.pdf)

WHEREFORE, in light of the foregoing and in the interest of the parties in seeking a resolution of this case reflecting their shared commitment to continued reforms to the CCAO to ensure a fair, just and transparent residential property tax assessment system in Cook County, it is hereby ordered:

Plaintiffs’ Amended Complaint is voluntarily dismissed with prejudice. Each party to bear its own costs and fees.

Judge Celia G. Gamrath

ENTERED: **NOV 06 2019**

**Circuit Court - 2031**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge