CHAPTER TWO

The Role of the Cook County Assessor in Mitigating and Correcting a Long History of Housing and Property Tax Inequity

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While not every person is responsible for paying property taxes, each of us is directly and indirectly impacted by this revenue source. Property taxes form the financial backbone of local governments, adding up to almost three-fourths of local tax revenues¹ – revenues which are used to finance K-12 education, police and fire departments, parks, and other services. Property taxes also impact housing supply and residential mobility. Since the taxes are based on a property's assessed value, any change in value also affects the transfers of existing properties and new investments. As such, property taxes both determine and reflect a community's vitality. Drastically dropping property values can be a signal of neighborhood deterioration and divestment; alternatively, fast rising property values can point to gentrification and the subsequent displacement of long-time residents who can't keep up with the increasing property tax levies.

Historical Context to Housing in Chicago

Chicago has been a notable site of inequitable housing policies, both informal and formal. Today's residential patterns result from decades of racial and ethnic segregation, predatory lending, racial covenants, and state-sponsored displacement. One real estate practice called 'blockbusting' is said to have originated specifically in Chicago. This phenomenon involved real estate agents and building developers convincing white residents to sell their property for an incredibly low price and then selling it to Black families at inflated rates. Agents were able to coerce these sales by convincing white residents that Black people were moving into their neighborhoods. The blockbusters used a variety of tactics to bolster their fearmongering: hiring Black women to push baby carriages in white neighborhoods, hiring Black men to drive through white neighborhoods with music blasting, paying Black youths to stage street brawls, buying houses and buildings and intentionally letting them deteriorate, and so

¹ Loughead, 2019.

on. The gradual disappearance of white people from areas with growing racial or ethnocultural diversity describes a pattern known as 'white flight' or 'white exodus.' Blockbusting is one tactic used to encourage white flight, with the specific distinction that it was orchestrated by real estate developers who banked on white people's fear of non-whites in their neighborhoods and profited by manipulating both white and Black families looking for decent housing.

A July 2022 study from Cook County Treasurer Maria Pappas's office details how mid-20th century "federal government-sanctioned housing discrimination" led to "urban decay and the ensuing exodus of Blacks from Chicago and other major U.S. cities."² These findings are connected to the city's long-standing practices of redlining neighborhoods with majority Black populations, a tool that banks used to make mortgage loans approvals. Potential borrowers for home purchases in redlined areas either faced higher interest rates or straight up loan refusals. This artificial barrier to financing greatly limited the housing market for racial minorities – a situation that lenders and developers exploited for their own financial gain.

According to a report by the Samuel DuBois Cook Center on Social Equity at Duke University and the Nathalie P. Voorhees Center at the University of Illinois-Chicago, an estimated \$3-4 billion in wealth was lost due to predatory housing contracts between the 1950s and 1960s³. Because Black Chicagoans had no means of formally accessing the wealth that comes with homeownership, they were easy targets of predation through abusive, informal contracts. While they made large down payments and faced monthly installments with high interest rates, the borrowers could not claim full ownership until the contract was paid in full and all conditions were met. The contract seller received the down payment and monthly remittances, while still holding the deed to the property. This continued ownership and the one-sided contract terms allowed the seller to find reason to evict the buyer at some point. The buyers were then left with no accumulated home equity, along with no protection from the law to constrain such manipulative practices. Contract buying affected 75 to 95 percent of homes sold to Black families between 1950-1960s⁴ and was especially prominent on the West and South Sides of Chicago.

² Pappas, Page 1.

³ Samuel DuBois Cook Center on Social Equity. 2019. Page 9.

⁴ Samuel DuBois Cook Center on Social Equity. 2019. Page iii.

Overt redlining and predatory contract selling were ended decades ago; their effects, however, continue to reverberate, limiting the economic and housing opportunities for Black and Brown Chicagoans today. The longstanding homeownership that has played an outsized role in providing families with generational wealth was not available on equal terms to racial minorities, who therefore are still playing catch-up with their white counterparts.

Today's Property Tax System

According to the Census Bureau, and calculations by the Tax Foundation for the 2016 fiscal year, Illinois ranks 9th highest in state and local property tax collections per capita⁵. Illinois' most populated county, Cook County, encompasses 5,173,146 people⁶ and 1.8 million parcels of property in the City of Chicago as well as some neighboring suburbs to the North and South⁷. While property taxes are collected and distributed by the Cook County Treasurer, the process goes through four other agencies before reaching the Treasurer's Office: the Cook County Assessor's Office (CCAO), the Cook County Board of Review, the Illinois Department of Revenue, and the Cook County Clerk⁸. While each agency has considerable influence on the property tax system, our inquiries will be focused on the Assessor's Office and their role in shaping a just property tax system.

The Cook County Assessor is an elected official with a four-year term and no cap on reelections. Historically a Democrat-dominated position, the 2022 election favored incumbent Fritz Kaegi (D) and secured him a second term, lasting through 2026. An asset manager for over twenty years, Kaegi's initial candidacy for Cook County Assessor in 2018 was his first run for public office. With a largely self-financed campaign, endorsements from the *Chicago Sun-Times, Chicago Tribune, Daily Herald,* and various politicians, and a slogan of "No favoritism, just fairness," Kaegi managed to oust two-term incumbent Assessor Joseph Berrios in what the *Chicago Tribune* described as a "rare toppling of the machine"⁹.

⁵ Loughead, 2019.

⁶ Illinois Demographics, 2021.

⁷ Cook County Assessor's Office. *About Page*.

⁸ Cook County Assessor's Office. *About Page*.

⁹ Chicago Tribune, 2020.

Unlike Kaegi, Berrios holds a long resume of political posts including Chairman of the Cook County Democratic Party (2007-2018); Commissioner of the Cook County Board of Review (2nd district, 1998-2010); Commissioner of the Cook County Board of Appeals (1988-1998); and, member of the Illinois House of Representatives (9th district, 1981-1987). From a working class Puerto Rican family, Berrios grew up in the Cabrini-Green public housing high-rises and worked several "low-skilled" jobs before breaking into politics. One of Berrios's early mentors, former State Senator Edward Nedza, would later be indicted and convicted for using his political office for illegal financial gain. Over his numerous positions and terms, Berrios also became the focus of FBI investigations¹⁰ as well as the subject of a fourpart investigative journalism report spearheaded by the *Chicago Tribune* and ProPublica Illinois¹¹. The Trib/ProPublica reporting found that under Berrios, the Cook County property tax system, through its assessment and appeals process, disproportionately burdened lower-income residents.

Berrios's political fundraising and his official duties also seemed to intersect. During his tenure on the Board of Appeals, Berrios accepted hundreds of thousands of dollars a year from lawyers who appealed property tax assessments before the Board¹². Berrios's subsequent position as Commissioner of the Board of Review also saw him collect over \$3 million in political contributions, of which 64 percent came from the 15 property tax law firms that gained the most for their clients (in the form of tax reductions) between 2006 and 2008.

Berrios's connections to law firms specializing in property tax work were part of what, at the time, was a broader phenomenon. The law firm of Madigan and Getzendanner was heavily involved in property tax appeals, while its senior partner Michael J. Madigan was one of the most powerful politicians in Illinois: Madigan served in the Illinois House for 50 years (1971-2021), including about 36 years as Speaker. Madigan and Berrios were close political allies. (On March 2, 2022, Madigan was indicted on federal racketeering charges.) Other major property tax appeal law firms with ties to politics were those of Patrick J. Cullerton (brother of Illinois State Senator John Cullerton) and Chicago Alderman Edward M. Burke. These law firms won huge tax breaks for their commercial real-estate clients, bolstering a lucrative

¹⁰ Berg, 2019.

¹¹ Grotto, 2017.

¹² Hinz, 2010.

business that suggests potential conflicts of interests with their partners' public responsibilities.

Berrios continued to accept sizable donations from tax attorneys during his 2010 campaign for Cook County Assessor, prompting the Cook County Board of Ethics to send letters to 15 tax attorneys warning that their donations exceeded county campaign contribution limits. Berrios's strong political connections and significant campaign funds helped him to election victory as Cook County Assessor, withstanding the fervent disapproval from various editorial boards: the *Chicago Tribune* named Berrios "a terrible candidate for the powerful office of assessor" due to "his disregard for basic ethical principles" and "patent conflicts of interest"¹³; the *Daily Herald* labeled Berrios as "the very antithesis of what the office needs,"¹⁴ and a *Chicago Mag* profile outlined him as "a consummate insider in Illinois politics" and "a vivid example of the clout-infested politics for which Illinois is famous."¹⁵

Fast forward to the 2018 local elections. Frederick "Fritz" Kaegi unseats Berrios in the Democratic primary and goes on to win the general election. Kaegi's campaign slogan "No favoritism, just fairness" and his stated values for equity and transparency were a direct contrast to Berrios's track record, especially as Berrios's administration came under fire from various directions, most notably the Trib/ProPublica four-part investigative article "The Tax Divide." By the time of the election, many Chicagoans believed that Cook County's property tax assessment system disproportionately favored the wealthy and politically connected over average homeowners and lower-income residents. Essentially, the need for government revenue from property taxes renders the system to be a sort of zero-sum game: "when one type of property is declared exempt from taxation, a different kind of property must make up the lost taxes."16 In Cook County, the Assessor's Office was consistently under-taxing more valuable homes and commercial properties, which pushed the tax burden onto everyone else. Kaegi promised to overhaul the entire system -- an ambitious task for a four-year position, where three of those years are spent with sequential reassessments of regional properties. Kaegi had about a year to

¹³ Chicago Tribune, 2010.

¹⁴ Daily Herald, 2010.

¹⁵ Bernstein, 2010.

¹⁶ Bender, 2022.

implement systemic changes in preparation for the 2019 reassessment of the North suburbs.

Campaign Promises

When asked by the *Chicago Sun-Times* (one of his endorsers) how he would improve the county's tax assessment process, Kaegi responded with the following five priorities: fairness and accuracy through better data, transparency, ethics reform, outreach and accountability, and automatic renewal of senior exemptions. While all five of these "promises" will be explored, we will focus on the CCAO's efforts toward (1) ethics reform, (2) fairness and accuracy through better data, (3) shifting the tax burden from residential properties to non-residential, and (4) outreach and accountability.

Ethics Reform

On Day One, Kaegi's office terminated any employees whose positions were due to favoritism or nepotism¹⁷. This office cleansing was the first step of an overarching 100-day plan¹⁸ intended to correct past practices of questionable ethics.

Cronyism and patronage are not new phenomena in Chicago public offices. The court-ordered Shakman decrees of the early 70s took on long practices of patronage hiring and politically-motivated firings. Under the Shakman decrees, the Assessor's Office has been put under supervision multiple times, with the most recent renewal of oversight occurring in 2012, during Berrios's tenure. A report by the Chicago Tribune found consistent patterns of political hiring and disregard for Shakman reforms; a top-level aide in Berrios's office noted that "the general impression of the employees in the office was that employment actions were based on nepotism, favoritism, or politics."¹⁹

November 1, 2022 marked the official end to anti-patronage supervision of the Assessor's office. Kaegi argued that his office has complied with hiring rules outlined in the Shakman decrees and should be freed from the imposed oversight. The federal judge hearing the motion concurred and removed the decree.

¹⁷ Cook County Assessor. *Medium*. 2019.

¹⁸ Cook County Assessor. *Medium*. 2019.

¹⁹ Chicago Tribune. December 21, 2017.

Fairness and Accuracy through Better Data

Real estate assessments result from the accumulation of multiple data sets detailing property characteristics and transactions, which are used to determine a property's market value. Technological advancement helps make the relevant information more accessible with emerging tools such as geographic information systems, 3D modeling, and improved mortgage databases. The public sector, however, is often a late adopter of technological improvements²⁰.

Early in Kaegi's term of office, the Assessor's Office requested an official audit from the International Association of Assessing Offices (IAAO); the results of the audit have since been publicized, both in their entirety and in a digestible summary on the Assessor's Office blog²¹. The IAAO's top recommendations were to: acquire high-quality data, increase staff and development, adapt more technology, and improve valuation methods. The common theme across these suggestions was to increase the office's capacity. The IAAO found that the CCAO had only ¹/₅ of the recommended number of employees working on residential assessments and only 25% of the valuation staffers needed for field checks. The IAAO's suggestions, however, are bound to run up against the CCAO budget.

Kaegi turned to the Illinois State Legislature to help address some of the IAAO's recommendations. He became a staunch advocate for the Data Modernization Bill, which would have granted his office the ability to collect operating income and expense data for income-generating, commercial properties. Kaegi identified the collection of this information as a crucial step toward accurate and fair assessments: "Collecting income and expense data up front -- on an anonymized and bulk basis -- would bring Cook County (and other counties in Illinois who choose to opt-in to this practice) in line with professional practices used by Assessors in at least 17 other states."²² While the bill passed the bi-partisan Senate in 2019, the bill languished in the House until January 13, 2021, where it ultimately died²³.

Despite the disappointing outcome for the Data Modernization Bill, Kaegi's office boasts about their steady progress toward more accurate assessments. A May

²⁰ Ovide. *NYT*. 2021.

²¹ Cook County Assessor, 2019.

²² Cook County Assessor's Office. May 23, 2019.

²³ Illinois General Assembly, Bill Status of SB1379.

16, 2022 update from his office reported that appeals in Chicago declined by 28% (almost 35,000 fewer appeals) compared to 2018: "A drastic reduction in appeals shows we are creating more accurate assessments for most property owners – homeowners and commercial property owners alike," Kaegi said. "For property owners who felt they were overassessed in the past, the 2021 assessments appear to have corrected those concerns."²⁴

Digital Advancement

One unalloyed improvement under Kaegi's tenure has been the vast digitization of records and forms. In 2021, the CCAO was recognized by the National Association of Counties for its work in transforming their paper-driven operations onto "more user-friendly digital platforms."²⁵ This advance meant that for the first time in the CCAO's history, applications for both property tax exemptions and assessment appeals were fully accessible online²⁶. Launched in 2020, the digital transition proved especially timely with the onset of Illinois' Stay-at-Home order in response to Covid-19.

Erroneous Exemptions

Even as Berrios's old system is being revamped, assessments are not problemfree. At the end of 2021, three years after Kaegi's election, journalists discovered that the CCAO was approving faulty tax exemptions. For six years, Berrios and then Kaegi had been granting a senior citizen tax exemption to Joseph J. Lombardi, a known mobster who died back in 2013²⁷. In Lombardi's case, applications on his behalf continued to be filled out and his death did not raise any red flags within the CCAO's database. This mistaken granting of an exemption presents a problem for Kaegi's advocacy for automatic renewal of senior exemptions, which he previously indicated could rely on the state's tracking of deaths and changes of ownership. On the other hand, Kaegi's team was the one to flag and correct this long-standing error, so perhaps it is not a matter of more errors occurring under their watch, but rather more errors being identified under their system.

²⁴ Cook County Assessor's Office. May 16, 2022.

²⁵ Cook County Assessor's Office. July 22, 2021.

²⁶ Cook County Assessor's Office. July 22, 2021.

²⁷ Novak, 2021.

Other "erroneous exemptions" during Kaegi's term include homeowners who received breaks they did not qualify for or were mistakenly granted -- as in the case of three Cook County homeowners who received veteran tax breaks, despite not applying for the benefits nor ever serving in the military. The mistakes have some lasting impact. One owner of a Berwyn two-flat gave notification of the tax error, and "got the assessor to remove the disabled veteran exemption that reduced his tax bill last year to zero — but then the assessor made the same mistake again this year."²⁸

It's unclear whether these mistakes are longstanding or new errors introduced under Kaegi's oversight, but such mistakes continue to cost the CCAO time and money. Since 2015, 13,349 homeowners have been given tax breaks they should not have received, and were then asked by the CCAO to repay a cumulative \$48.4 million, including penalties and interest²⁹. According to records from the Assessor and the Cook County Treasurer's office, "two-thirds of that money has been repaid in full or partial payments, but 2,170 others have paid nothing."³⁰ These mistakes may be relatively inconsequential, a small number compared to the 1.8 million parcels of property that are handled under the Assessor's Office, but they are still noteworthy as areas of concern.

Well-Intentioned, but Miscalculated Pandemic Relief

During the height of the pandemic, the CCAO's quest to support low-income homeowners may have been well-intentioned, but was reported to be poorly executed. Kaegi "tried projecting unemployment neighborhood by neighborhood and using that estimation of pandemic-related job losses to adjust how much he'd lower every homeowner's property assessment ... but in Grand Crossing, one of Chicago's poorest neighborhoods, homeowners saw small increases because Kaegi's office estimated it would face the same level of unemployment from the pandemic as the wealthy suburb of Winnetka."³¹ Others, like Mayor Lori Lightfoot in the Logan Square neighborhood, saw their bill decrease by 11%.

Although the *Chicago Sun-Times* described Kaegi's Covid-19 adjustment as a "botched" effort, an Op-Ed from *South Side Weekly* later pointed out how *CST's*

²⁸ Novak, 2021.

²⁹ Novak, 2021.

³⁰ Novak, 2021.

³¹ Novak, 2022.

conclusion may have been jumping the gun. *SSW* journalist Curtis Black explains that since sales data were not updated to reflect Covid-19, Kaegi used data sets that tracked how unemployment rates impacted property values, and on average reduced home assessments by ten percent (like Mayor Lightfoot's home). As for commercial properties, they were adjusted depending on the status of their respective industries, along with correcting for their historic under-assessments for years. Black writes: "In the following months, housing prices rebounded, as new at-home workers sought more space. But assessments are required to be based on current market conditions, not predictions of future trends. The housing market may be more or less voluble or even irrational, but assessments are a snapshot of values at a particular moment in time." Kaegi's assessments were more-or-less accurately calculated for the housing market at the time, and could (and should) not predict rapid changes as they unfolded in the pandemic-affected economy.

But even with those rapid market changes, Kaegi's assessment adjustments did not result in proportional impacts on the actual property tax bills that property owners received. While the *CST* cites double-digit assessment decreases for high-value properties like Mayor Lightfoot's, they don't mention how Lightfoot's tax bill only went down by 1.4 percent (from \$9,407 to \$9,272)³². Another example is Governor Pritzker, who saw an eight percent assessment reduction, but whose bill actually went up by over \$9,000³³.

In conclusion, assessments and actual tax bills do not always travel together in a proportional fashion. A homeowner who sees an increased assessment will still see a reduced bill if commercial properties, for instance, see even larger assessment increases. In any event, headline-grabbing claims about lower assessments for some wealthy property owners are not capturing the reality of either tax bills or the movement to undo historical favoritism towards high-value commercial properties.

Shifting the Tax Burden

Part of Kaegi's ambitions to close the income and racial inequities of property taxes involved shifting 9% of the property tax burden from homeowners to businesses, since homeowners and small businesses, particularly minority populations,

³² Black, Curtis. *South Side Weekly*.

³³ Black, Curtis. South Side Weekly.

have been "picking up the tab" for big properties.³⁴ Kaegi predicts that this 9% shift could "translate into an additional \$500 million staying in Chicago's neighborhoods."³⁵

Accurately assessing commercial properties, however, is no easy feat. Unlike residential parcels of property, whose value is compared to similar homes in the same neighborhood, commercial properties require other valuation measurements such as the total annual revenue generated by a building and the associated costs. The resulting Net Operating Income (income minus expenses) is then used with a benchmark capitalization rate ('cap rate') to generate an estimated market value. A property with a cap rate of five percent, for example, would have an estimated market value that is twenty times its Net Operating Income. According to Kaegi, his predecessor (Berrios) left no documentation on how his office was determining each commercial property's cap rate, while significantly undervaluing commercial properties all over Cook County³⁶.

Backlash from Commercial Property Constituents

Unsurprisingly, the commercial real estate sector has not been fully supportive of Kaegi's approach, which is aimed at shifting more of the tax burden in its direction. Since the CCAO began overhauling the old system, their reforms and assessments have received scrutiny from multiple business-focused news outlets.

In a March 2022 op-ed in *Crain's Chicago Business*, Farzin Parang, Executive Director of the Building Owners and Managers Association of Chicago, called out Kaegi for "piling additional tax burden onto businesses during the pandemic[;]... The idea that those empty office buildings are somehow worth twice what they were before the pandemic defies logic."³⁷ Parang uses statistics from the State's Department of Revenue to compare the accuracy of Berrios's 2018 assessments with Kaegi's 2019 versions. In this case, assessment accuracy is based on sales ratio studies: a comparison between property values as determined by assessors and the values of the same property as established by sales prices. The closer to 100%, the more accurate the assessment. The resulting graph makes a case that the CCAO under Kaegi may be widening the tax divide between single-family homes and commercial

³⁴ Cherone, 2022.

³⁵ Cherone, 2022.

³⁶ Cherone, 2022.

³⁷ Parang, 2022.

properties, but in the direction where the commercial sector is relatively disadvantaged. Nonetheless, there are at least two issues with respect to the data that could use further clarity. First, Cook County's assessments occur on a three-year cycle: the City of Chicago (2018), the North suburbs (2019) and the South suburbs (2020). To compare Berrios's 2018 to Kaegi's 2019 assessment is essentially comparing the City of Chicago to the North suburbs, for which multiple discrepancies exist. The number and types of parcels in the City of Chicago versus the North suburbs are not on a comparable scale.

The second part of Parang's argument that could use more nuance is the data source. He cites that the "County Assessment Accuracy" scale uses sales ratio studies to compare with 2018 and 2019 assessments. Sales ratio studies are an important tool assessors' use to measure level and uniformity of assessed values to current market values. They are not, however, the only factor that goes into calculating the total assessment. To use sales ratio studies as the sole analytic tool without noting their limitations can be misleading.

Finally, a non-data related point is that Parang might not be a neutral observer, given his political ties to Kaegi's opponents. The Building Owners and Managers Association of Chicago, for which Parang is the Executive Director, has donated to support both Berrios (back in 2008) and Kari Steele, who ran against and lost to Kaegi in the 2022 Democratic primary³⁸.

Outreach and Community Engagement

When working against decades of housing inequity, how does one holistically address such grievances? For Kaegi, shifting the tax burden that was disproportionately affecting minority homeowners was not enough. Kaegi's initial campaign for Assessor included a plan "to educate residents across the county on the services, exemptions, and benefits that are available to them—and keep them updated on the progress we are making—through public forums, seminars, and in quarterly and annual reports."³⁹

On the education front, the CCAO's outreach team, headed by Kelwin Harris, the Director of Outreach and Engagement, launched a series of Racial Equity and Real Estate Conversations in early 2020 for both the public and their own internal

³⁸ Illinois Sunshine.

³⁹ Chicago Sun-Times Editorial Board. October 3, 2018.

development. The range of programming includes "book readings, film screenings, and panel discussions with historians, practitioners, and authors who are knowledgeable about housing, real estate, and racial equity."⁴⁰ Some of those notable guests have included: Alden Loury (Senior Editor of *WBEZ*'s Race, Class, and Communities); Tonika Johnson (Social Artist and Founder of The Folded Map Project); Courtney Jones (President of Dearborn Realtist Board, the oldest African-American Real Estate Trade Organization); and Bruce Orenstein (filmmaker of The Color Tax and professor at Duke University). Recorded versions of events have been archived on the CCAO social media and website⁴¹. The initiative earned the Assessor's Office the 2022 Achievement Award from the National Association of Counties⁴², a notable accolade for Kelwin Harris, Kaegi, and the CCAO.

Other outreach efforts by the CCAO include educating Cook County residents on the often-intimidating assessment and appeals process. In addition to the 100+ informational videos the CCAO has recorded and chronicled on their Facebook page⁴³, they have also hosted over 250 events (both in-person and virtual) concerning township-specific property tax assistance, property tax exemptions, filing online appeals, and more⁴⁴. Their videos have garnered hundreds, and often thousands, of online views – a decent marker of their usefulness. By demystifying the assessment and appeals process, residents and homeowners are better equipped to challenge inaccurate assessments and navigate the appeals process with more confidence. Traditionally, property tax lawyers have been a near requisite for challenging assessments; now, the appeals process can be completed without legal counsel. Providing open-source knowledge and step-by-step walkthroughs brings Cook County residents one step closer to exerting their own agency. These measures also weaken the public's reliance on property tax lawyers, who have benefited from people not knowing how to navigate the property tax system.

⁴⁰ Cook County Assessor's Office. "Racial Equity and Real Estate Conversations"

⁴¹ Cook County Assessor's Office. "Racial Equity and Real Estate Conversations."

⁴² National Association of Counties.

⁴³ Cook County Assessor's Office. Videos. *Facebook*.

⁴⁴ Cook County Assessor's Office. Past Hosted Events. *Facebook.*

Closing Remarks

Kaegi ran on an ambitious reform plan and his first four years in office could be qualified as a success. Progress was made on ethics reform, better data, shifting the tax burden, and expanding community engagement. The next improvements might prove more difficult, especially as the Assessor's Office is only one piece of the property tax system. Nonetheless, there's plenty the CCAO can focus on that's within their control – tackling erroneous exemptions and continuing outreach and public education are two examples. Decades of inequities cannot be overcome in a day, or even one term in office, but progress can be continuous.

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