



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

APPELLANT: David Seger
DOCKET NO.: 21-27646.001-R-1
PARCEL NO.: 27-08-205-012-0000

The parties of record before the Property Tax Appeal Board are David Seger, the appellant, by attorney Andreas Mamalakis, of the Law Offices of Andreas Mamalakis, in Kenosha, 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: \$9,587
IMPR.: \$25,158
TOTAL: \$34,745

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 2021 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal. By correspondence dated June 18, 2025, the appellant waived the hearing request.

Findings of Fact

The subject property consists of a two-story townhouse of frame and masonry exterior construction with 2,300 square feet of living area. The townhome is approximately 33 years old. Features include a full basement, 2½ bathrooms, central air conditioning, a fireplace, and a two-car garage.¹ The property has a 6,848 square foot site and is located in Orland Park, Orland Township, Cook County. The subject is classified as a class 2-95 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 are located in the same neighborhood code and from .22 to .46 of a mile from

¹ The board of review reported the subject has a two-car garage. The appellant did not refute the assertion.

the subject. The comparables are improved with class 2-95 one-story or two-story townhomes of frame and masonry exterior construction ranging in size from 2,167 to 2,580 square feet of living area and from 32 to 34 years old. Each comparable has a full basement, 1½ or 2½ bathrooms, central air conditioning, a fireplace, and a 1.5-car garage. The comparables have improvement assessments ranging from \$17,691 to \$21,935 or from \$8.16 to \$8.75 per square foot of living area. Based on this evidence, the appellant requested that the improvement assessment be reduced to \$19,642 or \$8.54 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$34,745. The subject property has an improvement assessment of \$25,158 or \$10.94 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, three of which are located in the same neighborhood code and the same block/street as the subject. The comparables consist of one class 2-78 two-story dwelling and three class 2-95 two-story townhomes of frame and masonry exterior construction containing either 2,300 or 3,098 square feet of living area and are either 33 or 42 years old. Each comparable has a full basement, 2½ or 3½ bathrooms, a fireplace, and a two-car garage. The townhomes each have central air conditioning. The comparables have improvement assessments ranging from \$25,413 to \$35,511 or from \$11.05 to \$12.92 per square foot of living area. Based on this evidence, the board of review requested the assessment be confirmed.

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 suggested equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #1 and #2, which differ from the subject property in story-height and dwelling size, respectively, when compared to the subject property. The Board has given reduced weight to board of review comparable #1, which difference in classification, dwelling size, and age, when compared to the subject.

The Board finds the best evidence of assessment equity to be appellant's comparables #3, #4 and #5 along with board of review comparables #2, #3 and #4, which are each relatively similar to the subject in location, age, dwelling size, foundation type and features. Each of the appellant's comparables necessitate upward adjustments for smaller garage capacity when compared to the subject. These six comparables have improvement assessments ranging from \$19,829 to \$29,718 or from \$8.62 to \$12.92 per square foot of living area. The subject's improvement assessment of \$25,158 or \$10.94 per square foot of living area falls within the range established

by the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of living area basis.

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.

In conclusion, after considering adjustments to the best comparables 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: _____

December 23, 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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