

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Ilir Nanaj

DOCKET NO.: 21-35215.001-R-1 PARCEL NO.: 09-24-327-006-0000

The parties of record before the Property Tax Appeal Board are Ilir Nanaj, the appellant, by Andreas Mamalakis, attorney-at-law of the Law Offices of Andreas Mamalakis in Kenosha, Wisconsin, 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: \$4,843 **IMPR.:** \$31,255 **TOTAL:** \$36,098

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.¹

Findings of Fact

The subject property is improved with a two-story dwelling of masonry exterior construction containing 2,163 square feet of living area. The dwelling is approximately 65 years old. Features of the property include a crawl space or slab foundation, central air conditioning, 2½ bathrooms, and a 2-car garage.² The property has a 6,250 square foot site located in Niles, Maine Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The appellant's counsel originally requested a hearing before the Property Tax Appeal Board but subsequently withdrew the request for a hearing.

² The appellant described the property as having one fireplace while the board of review described the subject as having no fireplace. Neither party provided additional documentary evidence to support their respective description of the subject dwelling.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-05 properties improved with two-story dwellings of masonry exterior construction that range in size from 1,851 to 2,087 square feet of living area. The homes range in age from 65 to 67 years old. Each property has a full basement with four having finished area, one or two fireplaces, and a 1-car, 2-car or 2.5-car garage. The comparables have 1, 2 or 3 full bathrooms and three comparables have an additional half bathroom. Three comparables have central air conditioning. The comparables have the same assessment neighborhood code as the subject property and are located from .53 to .94 of a mile from the subject property. These properties have improvement assessments ranging from \$21,546 to \$23,083 or from \$10.56 to \$12.15 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$24,918.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$36,098. The subject property has an improvement assessment of \$31,255 or \$14.45 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 composed of 2-05 or class 2-78 properties improved with two-story dwellings of masonry exterior construction that range in size from 1,700 to 2,544 square feet of living area. The homes range in age from 61 to 73 years old. Three comparables have full basements with one having finished area and one comparable has a crawl space foundation. Each property has central air conditioning, 2 or 2½ bathrooms, and a 1-car or 2-car garage. One comparable has one fireplace. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$24,588 to \$38,639 or from \$14.45 to \$16.52 per square foot of living area. The board of review asserted the building assessed value per square foot for the comparables are the same or higher than the subject, which supports the correctness of the 2021 assessment.

Conclusion of Law

The appellant 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 information on nine equity comparables with the same assessment neighborhood code as the subject property. The comparables are improved with dwellings similar to the subject in style, age and exterior construction. Reduced weight is given appellant's comparables #2 and #5 as neither property has central air conditioning, which is a feature of the subject property. Less weight is given board of review comparables #2 and #3 due to differences from the subject in dwelling size. The Board gives most weight to appellant's comparables #1, #3 and #4 as well as board of review comparables #1 and #4 that are improved with dwellings that range in size from 1,851 to 2,163 square feet of living area. These properties have varying

degrees of similarity to the subject in features and have improvement assessments that range from \$21,546 to \$35,724 or from \$10.56 to \$16.52 per square foot of living area. Board of review comparable #4 is most similar to the subject in foundation and has an improvement assessment of \$30,093 or \$14.45 per square foot of living area. The subject's improvement assessment of \$31,255 or \$14.45 per square foot of living area falls within the range established by the best comparables in this record and is equivalent to the comparable most similar to the subject in foundation on a per square foot of living area basis. Based on this record 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.

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Member	Member
Dan De Kinin	Swan Bokley
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
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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 <u>PETITION AND EVIDENCE</u> 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

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COUNTY

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