



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

APPELLANT: David Lefly
DOCKET NO.: 21-42805.001-R-1
PARCEL NO.: 14-18-119-004-0000

The parties of record before the Property Tax Appeal Board are David Lefly, 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: \$41,103
IMPR.: \$70,897
TOTAL: \$112,000

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 2021 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 two improvements with 2,184 square feet of combined living area.¹ Improvement #1 is a 1.5-story dwelling of frame exterior construction with 1,287 square feet of living area. The dwelling is approximately 99 years old. Features include a full basement and 1 full bathroom. Improvement #2 is a 1-story dwelling of frame exterior construction with 897 square feet of living area. Features include a full basement and 1 full bathroom. The subject has a 4,567 square foot site and is located in Chicago, Lake View Township, Cook County.

¹ The second improvement was disclosed by the board of review and was unrefuted by the appellant. Improvement #2's dwelling size was calculated from the combined dwelling size reported by the board of review and the dwelling size for Improvement #1 as reported by the appellant and unrefuted by the board of review (2,184 – 1,287 = 897 square feet). Property characteristics for Improvement #2 were reported in the board of review's grid and unrefuted by the appellant.

Improvement #1 and Improvement #2 are classified as class 2-03 and 2-02 properties, respectively, under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to Improvement #1 only as the basis of the appeal. In support of this argument, the appellant submitted on four equity comparables located within the subject's assessment neighborhood. The comparables are improved with 1.5-story, class 2-03 dwellings of frame exterior construction ranging in size from 1,101 to 1,371 square feet of living area. The dwellings range in age from 117 to 119 years old. Each comparable has a full basement, 2 full bathrooms, and two fireplaces. Three comparables each have a 2-car garage. The comparables have improvement assessments ranging from \$25,281 to \$33,675 or from \$20.79 to \$30.59 per square foot of gross building area. Based on this evidence, the appellant requested the improvement assessment for Improvement #1 be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$112,000. The subject property has a total improvement assessment for both improvements of \$70,897 or \$79.04 per square foot of living area when utilizing 2,184 square feet of living area. No evidence was provided by either party on the allocation of the combined improvement assessment between the two improvements.

In support of its contention of the correct assessment for Improvement #1, the board of review submitted information on four suggested equity comparables located within the subject's assessment neighborhood. The comparables are improved with 1.5-story, class 2-03 dwellings of frame exterior construction ranging in size from 1,504 to 1,772 square feet of living area. The dwellings range in age from 108 to 132 years old. Each comparable has a full basement, central air conditioning, and a 2-car garage. Two comparables each have one fireplace. The comparables have improvement assessments ranging from \$51,301 to \$63,615 or from \$34.11 to \$38.45 per square foot of building area. Based on this evidence, the board of review requested that the subject's improvement assessment be confirmed.

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.

Initially, the Board finds the appellant is requesting a reduction for Improvement #1 only. As each party has reported the total improvement assessment for both improvements in their grid analyses, the Board will analyze the parties' comparables based on the combined total square footage of 2,184 square feet.

The parties' submitted eight suggested comparables for the Board's consideration. The Board finds none of the parties' comparables are truly similar to the subject since they were not

reported to have a second dwelling like the subject. The Board finds the parties' comparables are similar to the subject in neighborhood code and classification code with varying degrees of similarity to the subject in age, dwelling size, and other features. These differences suggest upward adjustments would be required to make the comparables more equivalent to the subject. The comparables have improvement assessments ranging from \$25,281 to \$63,615 or from \$20.79 to \$38.45 per square foot of living area. The subject's combined improvement assessment of \$70,897 or \$79.04 per square foot of living area falls above the range established by the comparables in this record. However, the subject property's higher total improvement assessment is logical considering it features two dwellings. Therefore, based on the equity evidence in this record, the Board finds the appellant did not demonstrate with clear and convincing evidence that Improvement #1 was inequitably assessed and a reduction in its 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: March 17, 2026



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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