



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

APPELLANT: Renee Campbell  
DOCKET NO.: 21-48794.001-R-1  
PARCEL NO.: 31-33-104-012-0000

The parties of record before the Property Tax Appeal Board are Renee Campbell, 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:** \$5,409  
**IMPR.:** \$6,606  
**TOTAL:** \$12,015

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 a multi-level dwelling of frame and masonry exterior construction with 1,175 square feet of living area. The dwelling is approximately 45 years old. The home features a partial basement with finished area, central air conditioning, two fireplaces and a two-car garage.<sup>1</sup> The property has an 11,388 square foot site and is located in Richton Park, Rich Township, Cook County. The subject is classified as a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

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<sup>1</sup> The parties differ as to the description of the subject dwelling. The appellant disclosed the subject has central air conditioning and two fireplaces, which was not reported by the board of review, and thus the subject is likely not being assessed for central air conditioning or the two fireplaces. The board of review reported the subject's basement is finished with a formal recreation room, which was not reported by the appellant.

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 have the same assessment neighborhood code as the subject and are located from .03 to .20 of a mile from the subject property. The comparables are class 2-34 properties that are improved with multi-level dwellings of frame exterior construction ranging in size from 1,175 to 1,347 square feet of living area. The dwellings are 45 or 46 years old. The comparables each have a partial basement with undisclosed basement finish, if any. Each comparable has central air conditioning, one or two fireplaces and a two-car garage. The comparables have improvement assessments that range from \$3,242 to \$4,398 or from \$2.51 to \$3.49 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$3,737 or \$3.18 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 \$12,015. The subject property has an improvement assessment of \$6,606 or \$5.62 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same assessment neighborhood code as the subject and are located within ¼ of a mile from the subject property. The comparables are class 2-34 properties that are improved with multi-level dwellings of frame and masonry exterior construction, each containing 1,378 square feet of living area. The dwellings are 39 or 42 years old. The comparables each have a partial basement with finished area, central air conditioning and a two-car garage. Comparable #4 has a fireplace. The comparables have improvement assessments ranging from \$8,641 to \$9,439 or from \$6.27 to \$6.85 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 comparable properties for the Board's consideration. The Board finds all the comparables are relatively similar to the subject in location, dwelling size, design and age. However, the comparables have features with varying degrees of similarity when compared to the subject, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables have improvement assessments that range from \$3,242 to \$9,439 or from \$2.51 to \$6.85 per square foot of living area. The Board finds the board of review comparables are the only comparables that were reported to have basement finish, like the subject and they have improvement assessments ranging from \$8,641 to \$9,439 or from \$6.27 to 6.85 per square foot of living area. The subject's improvement assessment of \$6,606 or \$5.62 per square foot of living area falls within the range established by the

comparables in the record and is well supported by the four comparables submitted by the board of review that have basement finish, like the subject. After considering adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. 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 presented.

Based on this record, the Board finds 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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