



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

APPELLANT: Jennifer Mallamud
DOCKET NO.: 22-23973.001-R-1
PARCEL NO.: 05-06-307-011-0000

The parties of record before the Property Tax Appeal Board are Jennifer Mallamud, the appellant, by attorney Thomas E. Sweeney of Siegel Jennings Co., LPA in Chicago; 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: \$30,240
IMPR.: \$102,760
TOTAL: \$133,000

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 2022 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 two-story dwelling of masonry exterior construction with 3,761 square feet of living area. The dwelling is approximately 86 years old. Features of the home include a full basement,¹ three full bathrooms, central air conditioning, two fireplaces and a 2-car garage. The property has a 16,800 square foot site and is located in Glencoe, New Trier Township, Cook County. The subject is classified as a class 2-06 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 four equity

¹ The parties differ as the subject's basement, the appellant reported in Section V of the Residential Appeal petition that the subject's basement has 3,761 square feet of finished area, whereas the board of review reported the subject has an unfinished basement.

comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located along the same street as the subject property. The comparables are improved with two-story dwellings of frame, stucco or frame and masonry exterior construction ranging in size from 3,393 to 4,040 square feet of living area. The dwellings are from 71 to 98 years old. The comparables each have a full or partial basement, two of which have finished area. No data was provided by the appellant concerning basement finish, if any, for comparables #2 and #3. Each comparable has three or four full bathrooms, one additional half bathroom, central air conditioning, one or two fireplaces and either a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$79,020 to \$98,520 or from \$20.68 to \$24.39 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$85,751 or \$22.80 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 \$133,000. The subject property has an improvement assessment of \$102,760 or \$27.32 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located within the same block and along the same street as the subject or approximately ¼ of a mile from the subject property. The comparables are improved with two-story dwellings of masonry exterior construction ranging in size from 3,311 to 3,426 square feet of living area. The dwellings are from 80 to 92 years old. The comparables each have a full or partial basement, one of which has finished area. Each comparable has two or three full bathrooms, one additional half bathroom, one or two fireplaces and either a 1.5-car or a 2-car garage. Comparable #2 has central air conditioning. The comparables have improvement assessments ranging from \$91,122 to \$101,540 or from \$27.39 to \$30.67 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 seven comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparable #3 due to the dwelling being 15 years younger than the subject. The Board has given reduced weight to board of review comparables #1 and #3 which lack central air conditioning and are 12% smaller than the subject dwelling.

The Board finds the appellant's comparables #1, #2 and #4, along with board of review comparable #2 have the same assessment neighborhood code and property classification code as the subject. The appellant's comparables #1, #2 and #4 are 11 or 12 years older than the subject and somewhat larger in dwelling size, when compared to the subject, whereas board of review comparable #2 is 6 years younger and somewhat smaller in dwelling size, when compared to the subject. These differences suggest adjustments would be required to make the comparables more equivalent to the subject. Additionally, these four comparables have other features that have varying degrees of similarity when compared to the subject, suggesting additional adjustments would also be necessary. Nevertheless, the comparables have improvement assessments ranging from \$81,480 to \$98,520 or from \$20.68 to \$27.39 per square foot of living area. The subject's improvement assessment of \$102,760 or \$27.32 per square foot of living area falls above the range established by the best comparables in the record in terms of total improvement assessment but within the range on a per square foot of living area basis. After considering adjustments to the best comparables for differences from the subject dwelling in age, size and features, 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: _____

September 16, 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

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