



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

APPELLANT: Stephen F. Schmidt
DOCKET NO.: 22-24535.001-R-1
PARCEL NO.: 07-36-308-029-0000

The parties of record before the Property Tax Appeal Board are Stephen F. Schmidt, the appellant, by Brian P. Liston, attorney-at-law of the Law Offices of Liston & Tsantilis, P.C. 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: \$6,770
IMPR.: \$26,521
TOTAL: \$33,291

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 is improved with a two-story dwelling of frame exterior construction that contains 1,768 square feet of living area. The dwelling is approximately 37 years old. Features of the property include a slab foundation, central air conditioning, one fireplace, 2½ bathrooms and a 2-car garage. The property has a 7,738 square foot site located in Elk Grove Village, Schaumburg Township, Cook County. The subject is classified as a class 2-07 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables consisting of class 2-07 properties improved with two-story dwellings of frame construction that have either 1,815 or 1,900 square feet of living area and range in age from 44 to 49 years old. Each comparable has a full or partial basement, central air conditioning, and a 2-

car or 2.5-car garage. Each property has 1, 1½ or 2½ bathrooms. Two comparables each have one fireplace. These properties have the same assessment neighborhood code as the subject property and are located either .8 of a mile or 1.2 miles from the subject property. Their improvement assessments range from \$25,918 to \$27,815 or from \$14.24 to \$14.64 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$25,247.

The appellant submitted a copy of the final decision issued by the board of review disclosing a total assessment for the subject property of \$33,291. The subject property has an improvement assessment of \$26,251 or \$15.00 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" and information on four equity comparables composed of class 2-07 properties improve with two-story dwellings of frame exterior construction that range in size from 1,821 to 1,949 square feet of living area. The dwellings range in age from 36 to 40 years old. Each property has a partial unfinished basement, a 2-car garage, and 1½, 2 or 2½ bathrooms. Three comparables have central air conditioning and two comparables each have one fireplace. Comparable #4 is described as having other improvements but no additional descriptive information was provided. These properties have the same assessment neighborhood code as the subject property and are located in the same assessment block as the subject property with comparables #1, #2 and #3 being located along the same street as the subject. The comparables have improvement assessments ranging from \$30,229 to \$32,276 or from \$15.51 to \$17.16 per square foot of living area. The board of review contends the building assessed value per square foot for the comparables are higher than the subject, which supports the assessed value as equitable.

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 seven equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to the appellant's comparables due to differences from the subject property in location and age. The Board finds the best evidence of assessment equity to be the board of review comparables that are more similar to the subject property in location and age than are the comparables submitted by the appellant. The board of review comparables have varying degrees of similarity to the subject in features that would require adjustments to make them more equivalent to the subject property. Three of the comparables have fewer bathrooms than the subject; two comparables have no fireplace, unlike the subject; and one comparable has no central air conditioning, dissimilar to the subject, necessitating upward adjustments to make the comparables more equivalent to the subject for these differences. Conversely, each of the board

of review comparables has a partial basement, superior to the subject's slab foundation, requiring downward adjustments to make the comparables more equivalent to the subject for this dissimilarity. The board of review comparables have improvement assessments that range from \$30,229 to \$32,276 or from \$15.51 to \$17.16 per square foot of living area. The subject's improvement assessment of \$26,251 or \$15.00 per square foot of living area falls below the range established by the best comparables in this record and appears appropriate after considering the differences in features between the subject property and the comparables. 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.



Chairman



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:

February 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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