



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

APPELLANT: Michele Birardi
DOCKET NO.: 22-36048.001-R-1
PARCEL NO.: 12-25-432-038-0000

The parties of record before the Property Tax Appeal Board are Michele Birardi, the appellant, by attorney John J. Piegore, of Sanchez, Daniels & Hoffman LLP 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: \$5,671
IMPR.: \$44,328
TOTAL: \$49,999

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 2-story multi-family building of masonry exterior construction with 3,415 square feet of gross building area. The building is approximately 52 years old. Features of the building include a full basement with an apartment,¹ 3 full and 2 half bathrooms, and a 2-car garage. The property has a 4,201 square foot site and is located in Elmwood Park, Leyden Township, Cook County. The subject is classified as a class 2-11 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 comparables that are located within the subject's assessment neighborhood and "less than mile"

¹ The board of review's grid analysis disclosed the subject's basement is finished with an apartment, which was unrefuted by the appellant.

from the subject. One comparable is also located along the subject's same street. The comparables consist of class 2-11, 2-story multi-family buildings of masonry exterior construction ranging in size from 3,437 to 3,790 square feet of gross building area. The buildings are from approximately 50 to 59 years old. The appellant reported in the grid analysis the comparables have full basements and "unknown" for the finished basement area. Each comparable has 3 or 4 full bathrooms and either a 2-car or a 2½-car garage. Three comparables have 1 or 2 half bathrooms. The comparables have improvement assessments that range from \$38,175 to \$41,563 or from \$10.76 to \$11.25 per square foot of gross building area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$37,941 or \$11.11 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the Cook County Board of Review final decision for the 2022 tax year disclosing the total assessment for the subject property of \$50,000. The subject property has an improvement assessment of \$44,329 or \$12.98 per square foot of building area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located within the subject's assessment neighborhood and within the same block and street as the subject. The comparables consist of class 2-11, 2-story multi-family buildings of masonry exterior construction with each containing 3,415 square feet of gross building area. The buildings are approximately 54 or 59 years old. The comparables have partial or full basements with a recreation room or an apartment and 3 full and 2 half bathrooms. Three comparables each have a 3-car garage. The comparables have improvement assessments that range from \$44,330 to \$45,330 or for \$12.98 and \$13.27 per square foot of gross building 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 eight comparables for the Board's consideration. The Board gives less weight to the appellant's comparables that are less similar to the subject in dwelling size than the board of review comparables. In addition, the appellant's grid analysis did not disclose information regarding the comparables finished basement area, which is needed for the Board to conduct a meaningful comparative analysis of the subject relative to the comparables.

The Board finds the best evidence of assessment equity to be the board of review comparables. These comparables are located in the subject's same assessment neighborhood, block and street and are also identical or relatively identical to the subject in design, building size, and foundation

type, except for differences in their garage amenities, including one comparable that lacks a garage, unlike the subject. These four comparables have improvement assessments ranging from \$44,330 to \$45,330 or for \$12.98 and \$13.27 per square foot of living area. The subject's improvement assessment of \$44,329 or \$12.98 per square foot of living area is well supported by the best comparables in the record. 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 and a reduction in the subject's assessment is not justified.

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 the 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.

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: _____

August 19, 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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