



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Joe Brody
DOCKET NO.: 22-44513.001-R-1
PARCEL NO.: 14-28-312-066-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Joe Brody, 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, PTAB hereby finds *A Reduction* in the Cook County Board of Review's assessment of the property is merited. The correct assessed valuation of the property is:

LAND:	\$63,000
IMPR.:	\$102,440
TOTAL:	\$165,440

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision 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 5,122 square feet, two-story masonry building perched on a 5,250 square feet lot in Chicago, Lakeview Township, Cook County. The 123-year-old, class 2-11 structure featured 4.5 bathrooms, four fireplaces, central air conditioning, and a full basement. On the petition, the appellant indicated that the subject last sold in December 2013 for \$1,500,000 and that assessment inequity was the basis of the appeal.

Contesting the equity of the \$110,482 subject improvement assessment, the appellant argues the rate should be lowered to \$19.33 per improvement square foot. As evidence of assessment inequity, the appellant put forth five class 2-11 properties within .38 miles of the subject with improvement assessments between \$18.97 and \$20.01 per living square foot. The appellant's suggested comparables had no air conditioning, two fireplaces, four or six bathrooms, no garage

to a two-car garage, and a full basement. These potential comparators also varied from 121 to 140 years in building age and from 4,360 to 5,783 square feet in improvement size.

The board of review countered that the subject improvement assessment of \$110,482, or \$21.57 per living square foot, was equitable in its “Notes on Appeal.” In defense of the \$173,482 total subject assessment, the county board of review nominated four two-story masonry buildings within a quarter mile of the subject as assessment benchmarks. The board of review’s preferred comparators all featured air conditioning except submission #4, a full basement, zero to two fireplaces, and 2.5 to 4.5 bathrooms. These properties were between 118 and 133 years in building age; between 4,114 and 5,734 square feet in living area; and between \$23.80 and \$31.82 per living square foot in improvement assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. The Illinois Constitution requires real estate taxes “be levied uniformly by valuation ascertained as the General Assembly shall provide by law.” Ill. Const., art. IX, § 4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). Yet this uniformity provision of the Illinois Constitution does not require absolute equality in taxation; instead, a reasonable degree of uniformity in the taxing authority’s assessments suffices. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When unequal treatment in the assessment is the basis of a property tax appeal, the appellant must prove the inequity of the assessments by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof needed for a criminal conviction. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). Proof of unequal treatment in the assessment process should comprise documentation for the year in question of similarly situated properties with compelling proximity to, and a lack of distinguishing characteristics from, the subject property. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant overcame this burden of proof.

Appellant comparables #2, #3, and #5 best matched the subject’s attributes of the properties selected by the parties and therefore constitute the best evidence of assessment equity. First, because none of the board of review’s comparables featured air conditioning, unlike the subject—and none of the properties had characteristics that could compensate for the air conditioning exclusion and still remain reasonably comparable to the subject—the board of review comparables do not comprise the best evidence of assessment uniformity for the subject. By contrast, appellant comparables #2, #3, and #5 all had larger improvements than the subject and otherwise alleviated their collective lack of air conditioning with a two-garage in the cases of comparators #3 and #5. Based on this record, the subject improvement would be equitably assessed anywhere between \$18.97 and \$20.01 per living square foot. Because the subject’s \$21.57 per improvement square foot assessment exceeds the high end of this range, PTAB finds the appellant demonstrated assessment inequity by clear and convincing evidence and a reduction in the assessment to \$20.00 per living square foot for a total subject assessment of \$165,440 is warranted.

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: _____

C E R T I F I C A T I O N

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:

January 20, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Joe Brody, by attorney:
Andreas Mamalakis
Law Offices of Andreas Mamalakis
4844 89th Place
Kenosha, WI 53142

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602