



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

APPELLANT: Carolyn Broquet  
DOCKET NO.: 22-44522.001-R-1  
PARCEL NO.: 14-29-202-036-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Carolyn Broquet, 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 **No Change** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

**LAND:** \$36,750  
**IMPR.:** \$36,250  
**TOTAL:** \$73,000

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) contesting 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**

A 3,483 square feet, two-story building of frame construction perched on a 2,450 square feet parcel in Chicago, Lakeview Township, Cook County comprises the subject property. The 134-year-old, class 2-11 property featured four bathrooms; no air conditioning, fireplace, or garage; and a full basement. The appellant selected assessment equity as the basis of the appeal.

Arguing the \$36,250 subject improvement assessment is inequitable, the appellant contends the assessment should be lowered to \$7.16 per improvement square foot. To show nonuniformity, the appellant placed into evidence five class 2-11 properties within .63 miles of the subject with improvement assessments between \$4.80 and \$9.21 per living square foot. The appellant's suggested comparables featured four or five bathrooms, two fireplaces, and a full or crawl-space basement. These potential comparator improvements were 126 to 144 in building age and 2,960 to 4,050 square feet in improvement size.

The board of review countered that the subject improvement assessment of \$36,250, or \$10.41 per living square foot, was equitable in its “Notes on Appeal.” In defense of the \$73,000 total subject assessment, the county board of review selected four buildings within a quarter mile of the subject as equity comparables. The board of review’s preferred comparators all featured a two-car garage (except submission #3), three or four bathrooms, and no air conditioning (except submission #2). These properties were between 123 and 133 years in building age; between 2,613 and 3,297 square feet in living area; and between \$11.09 and \$18.42 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 assessment documentation for the year in question of similarly situated properties with compelling proximity to, and lack of distinguishing characteristics from, the subject property. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant did not surmount this burden of proof.

As the properties most similar in size to the subject improvement, board of review comparables #1, #3, and #4 provide the best evidence of equitable subject improvement assessments. Board of review comparables #1 and #4 mitigated a smaller living area with a two-car garage, though comparator #4’s one fewer full bathroom relative to the subject places it at the low end of the equitable range. By contrast, though it mirrored the subject’s lack of a garage, board of review comparable #3 was closest to the subject in size and building age. Given the evidence in this record, the range of equitable assessments for the subject runs from \$11.09 to \$12.12 per living square foot. Because the subject’s \$10.41 per improvement square foot assessment falls below this range, PTAB finds the appellant did not produce sufficiently clear and convincing evidence that the subject assessment was inequitable or that a reduction thereof is 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: \_\_\_\_\_

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

Carolyn Broquet, 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