



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

APPELLANT: Sadia Shah
DOCKET NO.: 22-44526.001-R-1
PARCEL NO.: 14-29-316-019-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Sadia Shah, 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: \$37,500
IMPR.: \$46,208
TOTAL: \$83,708

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

A 2,432 square feet, two-level masonry building perched on a 2,500 square feet lot in Chicago of Lakeview Township, Cook County constitutes the subject property. The 129-year-old, class 2-11 residence per the Cook County Real Property Assessment Classification Ordinance included two bathrooms, a two-car garage, two fireplaces, and a full basement. The appellant represented that the subject last sold in December 1997 and that assessment equity was the basis of the appeal.

Arguing the \$46,208 assessment is inequitably high for the subject improvement, the appellant contends the assessment must be lowered to \$13.08 per improvement square foot. To show the subject was not uniformly assessed, the appellant volunteered five class 2-11 structures within .46 miles as assessment benchmarks. The appellant's proposed comparators all featured two fireplaces, no garage or a two-car garage, a full basement, and two to three bathrooms. Moreover,

these properties were between 110 and 136 years in building age; 2,260 and 2,904 in living square footage; and \$10.70 and \$14.82 per improvement square foot in assessment.

The county board of review maintained in its “Notes on Appeal” that the subject improvement was fairly assessed at \$46,208, or \$19.00 per living square foot. In defense of the \$83,708 total subject assessment, the board of review nominated four two-story masonry properties within a quarter mile of the subject as equity comparables. The county board of review’s selections featured no fireplace or air conditioning, two to three bathrooms, and a full basement. These suggested comparators ranged from 97 to 128 years in building age; 2,120 to 2,568 square feet in living area; and \$19.01 to \$21.81 per improvement square foot in assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. The Illinois Constitution requires that 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). This uniformity provision of the Illinois Constitution does not require absolute equality in taxation, however; 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 a property tax appeal is based on unequal treatment in the assessment, 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 required for a criminal conviction. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). Proof of unequal treatment in the assessment process should consist of documentation for the year in question of sufficiently similar properties showing the proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant did not surpass this burden of proof.

As the properties most similar to the subject in size, board of review comparables #1 and #2 and appellant comparable #4 establish the range of equitable assessments for the subject improvement. Board of review comparable #1’s improvement was the same size as the subject and substituted the subject’s two fireplaces for an extra full bathroom. Meanwhile, board of review comparable #2 featured more living square footage, which more than compensated for the lack of fireplaces. By contrast, appellant comparable #4 lacked the subject’s garage and some of its living space, placing it at the bottom of the equitable range of subject improvement assessments, which spans from \$14.25 to \$21.81 per improvement square foot. Because the subject’s \$19.00 per improvement square foot assessment falls within this range, PTAB concludes the appellant did not demonstrate assessment inequity by clear and convincing evidence and a reduction in the 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

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

APPELLANT

Sadia Shah, 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