



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

APPELLANT: Daniel Marino
DOCKET NO.: 22-49780.001-R-1
PARCEL NO.: 04-34-113-001-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Daniel Marino, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd. in Chicago; 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: \$40,002
IMPR.: \$177,997
TOTAL: \$217,999

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

An 8,298 square feet, two-story building of frame and masonry construction on a 16,001 square feet site in Glenview, Northfield Township, Cook County comprises the subject property. The 22-year-old structure, a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance, featured four bathrooms, two fireplaces, central air conditioning, a three-car garage, and a full basement.

Arguing the \$177,997 improvement assessment is inequitably high for the subject, the appellant implores the Property Tax Appeal Board (PTAB) lower the assessment rate to \$17.86 per improvement square foot. To bolster the inequity contention, the appellant placed into evidence five class 2-09 properties in the subject's neighborhood with improvement assessments between \$11.79 and \$20.19 per living square foot. The appellant's preferred comparables all included air

conditioning, a full basement, three to five bathrooms, and a garage that could house at least 1.5 cars.

In its “Board of Review Notes on Appeal,” the county board of review responded that the subject improvement was properly assessed at \$177,997, or \$21.45 per living square foot.¹ The county board of review defended the \$217,999 total subject assessment with four two-story, masonry buildings on the same block as the subject as equity comparables. The board of review’s preferred assessment benchmarks each had air conditioning, a three-car garage, a 22-year-old improvement, a full basement, and one or two fireplaces. These properties further ranged from 4.5 to 5.5 bathrooms; 5,039 to 5,340 square feet in living area; and \$23.23 to \$25.37 per improvement square foot in 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). 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 needed 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 not fewer than three comparable properties showing the similarity, proximity, and lack of distinguishing characteristics of the comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant did not overcome this burden of proof.

By submitting properties that had improvements over 2,504 and 2,958 fewer square feet than the subject, respectively, the appellant and the board of review ensured that none of the evidence was reasonably comparable to the subject property and therefore indicative of uniform property tax assessment. Rather, this record tends to highlight the idiosyncrasy of the subject property; apparently, no nearby improvements even approach the size of the subject improvement. Because the record contains no properties that are proximal to, or lack distinguishing characteristics from, the subject, PTAB finds the appellant did not prove by clear and convincing evidence the subject was inequitably assessed relative to comparable properties and therefore a reduction in the assessment is not justified.

¹ PTAB observes that in its “Notes on Appeal,” the county board of review referenced its 2023 decision from which the appellant appeals. PTAB accordingly adopts the total assessment value reflected in that decision, minor discrepancies in the “Notes on Appeal” notwithstanding.

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: _____

November 25, 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

AGENCY

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