



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

APPELLANT: Bianca Virgili  
DOCKET NO.: 22-49807.001-R-1  
PARCEL NO.: 03-22-100-073-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Bianca Virgili, 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:** \$8,832  
**IMPR.:** \$20,525  
**TOTAL:** \$29,357

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 1,401 square feet, one-story building of frame-and-masonry construction situated on a 22,080 square feet lot in Prospect Heights of Wheeling Township, Cook County constitutes the subject property. The 66-year-old, class 2-03 residence per the Cook County Real Property Assessment Classification Ordinance included 2.5 bathrooms, a two-car garage, air conditioning, and a partial basement.

The appellant contends assessment inequity as the basis of the petition, asserting that the subject improvement assessment must be lowered to \$11.10 per improvement square foot to be equitable. To show the subject was not uniformly assessed, the appellant volunteered five class 2-03 structures within .89 miles of the subject as assessment benchmarks. The appellant's proposed comparators featured a one- or two-car garage, air conditioning (except submission #1, which had none), and one or 1.5 bathrooms. Moreover, these properties were between 73 and 83 years in

building age; 1,468 and 1,643 in living square footage; and \$10.51 and \$12.15 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 \$20,525, or \$14.65 per living square foot. In defense of the \$29,357 total subject assessment, the board of review put forth three one-story improvements on the subject’s block as equity comparables. The county board of review’s selections featured a two-car garage, 1.5 or 2.5 bathrooms, and a full basement. These suggested comparators ranged from 65 to 72 years in building age; 1,125 to 1,600 square feet in living area; and \$15.16 to \$15.96 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 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 demonstrably similar 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 did not surpass this burden of proof.

Of the parties’ submissions, board of review comparable #3 and appellant comparables #3 and #4 most resembled the subject and therefore comprise the range of equitable assessments for the subject improvement. Board of review comparable #3’s nearly 200 extra square feet of living space and extra fireplace helped compensate for its lack of air conditioning relative to the subject. By contrast, both appellant comparables #3 and #4 featured air conditioning and one fireplace like the subject, but both had an inferior basement and lacked one full bathroom. Moreover, appellant comparable #3 had a smaller garage, placing it at the low end of the equitable assessment range, which runs from \$10.92 to \$15.36 per improvement square foot. Because the subject’s \$14.65 per improvement square foot assessment falls below 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

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

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