



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

APPELLANT: Brian Tomasiewicz
DOCKET NO.: 22-50052.001-R-1
PARCEL NO.: 03-30-218-018-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Brian Tomasiewicz, the appellant, by attorney Max E. Callahan, of Siegel & Callahan, P.C. in Chicago; 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 justified. The correct assessed valuation of the property is:

LAND: \$6,864
IMPR.: \$81,920
TOTAL: \$88,784

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 3,144 square feet, two-story frame structure on a 6,864 square feet parcel in Arlington Heights, Wheeling Township, Cook County. The one-year-old residence contained 4.5 bathrooms, central air conditioning, a two-car garage, and a full basement. The owner-occupied property sold in June 2020 for \$887,841 by Rize Properties LLC—but without advertising the property for sale. The subject was not sold pursuant to a foreclosure action or a contract for deed.

The appellant contends the \$96,468 subject assessment overvalues the subject property. The appellant supported the overvaluation argument with a copy of the master settlement statement, or closing disclosure, indicating the subject sold in June 2020 for \$887,841 to borrowers Brian Tomasiewicz and Jessica Tomasiewicz. The appellant represented that “the owner of the subject

did not have a relationship with the seller other than that of the traditional buyer/seller relationship,” implying an arms’ length transaction.

In its “Notes on Appeal,” the county board of review maintained that the subject was correctly assessed at \$96,468. To fortify this position, the board of review supplied details about four sales of one-story properties in the subject’s subdivision. The county board of review’s comparable sales, which included five- to 72-year-old improvements between 768 and 2,818 square feet in size, occurred between April 2021 and November 2022 for purchase prices from \$235,000 to \$910,000, or \$305.99 to \$353.81 per square foot.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in the Cook County Board of Review’s 2023 assessment of the subject. When a taxpayer bases a property tax appeal on overvaluation, the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of a recent sale or appraisal of the subject property, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant satisfied this burden of proof.

In this record, the appellant attached to the petition a master settlement statement confirming that the subject sold in June 2020, fewer than two years before the 2022 assessment year, for \$887,841. By contrast, the board of review submitted four recent sales—one of which featured a property remarkably dissimilar from the subject property. As such, based on the proximity of the purchase date to the assessment date, the credibility of the evidence supporting the purchase price, and the lack of evidence to the contrary, PTAB finds that the market valued the subject property around \$887,841. PTAB accordingly concludes the appellant showed overvaluation by a preponderance of the evidence and a reduction in the total subject assessment to \$88,784, commensurate with the indicated market value and the appellant’s request, 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: _____

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:

April 21, 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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