



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

APPELLANT: Jeremy Hribar
DOCKET NO.: 22-50770.001-R-1
PARCEL NO.: 03-17-205-008-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Jeremy Hribar, 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 *A Reduction* in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

LAND: \$9,625
IMPR.: \$30,773
TOTAL: \$40,398

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 2,619 square feet, two-story structure of frame-and-masonry construction on an 8,750 square feet parcel in Arlington Heights, Wheeling Township, Cook County comprises the subject property. The 50-year-old building, a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance, contained 2.5 bathrooms, air conditioning, a two-car garage, and a partial basement. The subject last sold in June 1989 for \$270,000.

Contending assessment inequity as the basis of the appeal, the appellant argues the subject assessment should be reduced to \$11.48 per improvement square foot to be on par with those of similar properties. As evidence, the appellant offered five class 2-78 properties within .43 miles of the subject. The appellant's suggested comparables each featured a one- or two-car garage, 1.5 or 2.5 bathrooms, and air conditioning. These potential comparators varied from 34 to 51 years in

building age; from 2,435 to 2,799 square feet in improvement size; and from \$10.90 to \$11.76 per living square foot in improvement assessment.

The board of review countered that the subject improvement assessment of \$34,702, or \$13.25 per living square foot, was equitable in its “Notes on Appeal.” In defense of the \$44,327 total subject assessment, the county board of review nominated four buildings on the subject’s block as equity comparables. The board of review’s preferred comparators all featured a partial basement, a two-car garage, and air conditioning, except submission #3. These properties were 51 to 55 years in building age; 2,228 to 3,052 square feet in living area; and \$14.01 to \$14.21 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 the ground for appeal is unequal treatment in the assessment, the inequity of the assessments must be proved 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 should consist of assessment documentation for the year in question of similarly situated 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 satisfied this burden of proof.

In this record, appellant comparables #3 through #5 most resembled the subject improvement and therefore provide the best evidence of assessment equity. Appellant comparables #4 and #5 both had slightly more living space than the subject and otherwise matched the subject improvement’s amenities. Meanwhile, as an inferior property with less living space, appellant comparable #3 anchors the low end of the range of acceptable subject assessments, which spans \$11.59 to \$11.76 per improvement square foot. Because the subject improvement assessment of \$13.25 per improvement square foot exceeds the top of this range, PTAB concludes the appellant proved inequitable assessment by clear and convincing evidence and a reduction in the subject assessment to \$11.75 per improvement square foot for a total subject assessment of \$40,398 is merited.

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

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

APPELLANT

Jeremy Hribar, 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