



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

APPELLANT: Leo Cios
DOCKET NO.: 22-53136.001-R-1
PARCEL NO.: 04-26-206-009-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Leo Cios, 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: \$23,200
IMPR.: \$63,800
TOTAL: \$87,000

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 2,952 square feet building of frame and masonry construction on a 23,200 square feet lot in Glenview, Northfield Township, Cook County. The 66-year-old, class 2-78 property per the Cook County Real Property Assessment Classification Ordinance, contained three bathrooms, a full basement, two fireplaces, central air conditioning, and a two-car garage.

Contesting the \$63,800 subject improvement assessment as inequitable, the appellant contends the assessment rate should be reduced to \$7.31 per improvement square foot instead. To show that the subject assessment is not on par with those of similar properties, the appellant proposed five class 2-78 properties in the subject's neighborhood as assessment benchmarks. These suggested comparators each had air conditioning, one fireplace, a two-or three-car garage, and a full basement. The appellant's selections also ranged between one and 22 years in building age; 3,068

and 3,643 in living square footage; and \$7.00 and \$13.07 per improvement square foot in assessment.

The county board of review responded that the subject improvement was fairly assessed at \$63,800, or \$21.61 per living square foot in its “Board of Review Notes on Appeal.” In defense of the \$87,000 total subject assessment, the county board of review offered information about four two-story buildings in the subject’s subarea with improvement assessments from \$24.30 to \$29.06 per square foot. The board of review’s preferred comparables all featured air conditioning, one fireplace, 2.5 or 3.5 bathrooms, and a full or partial basement. These properties further ranged from 50 to 53 years in building age; 2,739 to 3,073 square feet in improvement area; and a two- to three-car garage.

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 assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant fell short of satisfying this burden of proof.

PTAB first observes that the appellant submitted four purported comparables that were less than half the age of the subject improvement, and one new improvement that was nearly 700 square feet larger than the subject’s.¹ Given the parties’ submissions, board of review comparables #2 through #4 most resemble the subject improvement and therefore provide the best evidence of assessment equity. Board of review comparables #2 and #3 were two properties that contained 200 fewer square feet in livable area, and larger garages, than the subject improvement. By contrast, board of review comparable #4 contained more living and garage space than the subject, which was somewhat offset by its one fewer full bathroom. The range of equitable assessments in this record thus runs from \$24.30 to \$25.00 per improvement square foot. Because the \$21.61 per improvement square foot subject assessment falls below this range,

¹ PTAB notes discrepancies between the appellant’s description of the subject and the board of review’s description. Upon reviewing all of the evidence, PTAB considers these discrepancies immaterial to the outcome.

PTAB finds the appellant did not show by clear and convincing evidence that a reduction is 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: _____

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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