



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Robert Patton  
DOCKET NO.: 22-55887.001-R-1  
PARCEL NO.: 04-35-409-008-0000

The parties of record before the Property Tax Appeal Board are Robert Patton, the appellant, by Andreas Mamalakis, attorney-at-law of the Law Offices of Andreas Mamalakis in Kenosha, Wisconsin, and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

<b>LAND:</b>	\$34,976
<b>IMPR.:</b>	\$70,500
<b>TOTAL:</b>	\$105,476

Subject only to the State multiplier as applicable.

### **Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Cook County Board of Review 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.<sup>1</sup>

### **Findings of Fact**

The subject property is improved with a two-story dwelling of frame and masonry exterior construction containing 3,287 square feet of living area. The dwelling is approximately 73 years old. Features of the property include a partial basement with a formal recreation room, three fireplaces, three bathrooms and a 1½-car garage. The property has a 21,860 square foot site located in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-06 properties improved with two-story dwellings of frame and

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<sup>1</sup> The appellant's counsel originally requested a hearing before the Property Tax Appeal Board but subsequently withdrew the request for a hearing.

masonry exterior construction that range in size from 3,196 to 3,931 square feet of living area. The homes range in age from 63 to 84 years old. Each comparable has a full or partial basement, one or two fireplaces, and a 2-car or 2.5-car garage. The comparables have 2½, 3 or 3½ bathrooms and four comparables have central air conditioning. These properties have the same assessment neighborhood code as the subject and are located from .08 to .29 of a mile from the subject property. The comparables have improvement assessments that range from \$71,688 to \$93,640 or from \$20.82 to \$23.82 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$74,220.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$116,000. The subject property has an improvement assessment of \$81,024 or \$24.65 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-06 properties improved with two-story dwellings of frame and masonry exterior construction that range in size from 2,819 to 4,027 square feet of living area. The homes range in age from 71 to 83 years old. Three comparables have a full or partial basement with finished area, and one comparable has a crawl space foundation. Each property has central air conditioning, one or two fireplaces, two or three full bathrooms, one or two half bathrooms, and a 2-car or 2.5-car garage. These properties have the same assessment neighborhood code as the subject property and are located in the same block or ¼ of a mile from the subject property. Their improvement assessments range from \$71,358 to \$84,021 or from \$20.86 to \$25.31 per square foot of living area. Board of review comparable #2 is the same property as appellant's comparable #4.

### **Conclusion of Law**

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less 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 Board finds the evidence in this record supports a reduction in the subject's assessment.

The parties submitted information on eight equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions with one comparable being a duplicate. The Board gives less weight to appellant's comparables #2, #3 and #5 due to differences from the subject dwelling in size. The Board gives less weight to board of review comparables #1 and #4 due to differences from the subject in size and the fact comparable #4 differs from the subject in foundation. The Board finds the best evidence of assessment equity to be appellant's comparables #1 and #4 as well as board of review comparables #2 and #3, which includes the duplicate comparable, that range in size from 3,196 to 3,444 square feet of living area. These comparables have varying degrees of similarity to the subject that would require adjustments to make them more equivalent to the subject property. Each comparable has a larger garage than the subject, two comparables have central air conditioning, unlike the subject, and one comparable has a full basement, unlike the subject,

indicating downward adjustments to the comparables would be appropriate to make the comparables more equivalent to the subject for these differences. One comparable has an additional half bathroom that the subject does not have, indicating a downward adjustment would be appropriate, while one comparable has one half less bathroom than the subject indicating an upward adjustment would be proper. Additionally, the comparables have one or two fewer fireplaces than the subject suggesting upward adjustments would be proper for this difference. These comparables have improvement assessments that range from \$71,688 to \$77,288 or from \$20.82 to \$24.13 per square foot of living area. The subject's improvement assessment of \$81,024 or \$24.65 per square foot of living area falls above the range established by the best comparables in this record. Based on this record, after considering the appropriate adjustments to the best comparables to make them more equivalent to the subject property, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment 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: \_\_\_\_\_

C E R T I F I C A T I O N

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:

January 20, 2026



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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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