



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

APPELLANT: Amy Maglio
DOCKET NO.: 23-21404.001-R-1
PARCEL NO.: 16-18-201-012-0000

The parties of record before the Property Tax Appeal Board are Amy Maglio, the appellant(s); and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** 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:

LAND: \$7,000
IMPR.: \$38,808
TOTAL: \$45,808

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 2023 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 two-story, single-family dwelling of stucco construction with 1,848 square feet of living area. Features of the dwelling include one and one-half baths, a partial unfinished basement, and a two-car garage. The dwelling was constructed in 1910. The property has a 5,000 square foot site and is located in Oak Park Township, Cook County.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on six equity comparables. These comparables are described as of stucco construction, two-story, single-family dwellings. They range in age from 99 to 115 years; in size from 1,851 to 1,969 square feet of living area; improvement assessment from \$17.84 to \$18.85 per square foot of living area. These properties have full unfinished basement areas and 2 car garages. The suggested comparable properties are located within a 5 block or .30 mile radius of the subject property. The appellant requested the subject's total assessment be reduced to \$42,949.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$45,808. The subject has a total improvement assessment of \$38,808 or \$21.00 per square foot of living area. In support of the assessment, the board of review submitted four equity comparables. These comparables are described as of frame or stucco construction, two-story single-family dwellings. They range in age from 106 to 118 years; in size from 1,900 to 2,173 square feet of living area; improvement assessment from \$21.17 to \$21.27 per square foot of living area.

In rebuttal, the appellant submitted a grid outlining the differences in size of the appellant's and the board of review's comparables. The appellant also stated that the appellant's comparables are more similar in size, location, condition and construction to the subject than the board of review's comparables.

At hearing, the appellant testified as to the characteristics of all their six comparables and concluded that these comparables are most similar to the subject regarding location, size, age, and construction. The appellant reaffirmed the evidence previously submitted and the appellant requested a reduction in the subject's total assessed value. The board of review testified that the board of review's comparables #1 and #4 are within one quarter mile of the subject and similar in age, size, and location. The board of review testified that the appellant's comparables set the low range while the board of review's evidence sets the high range of assessed values and since the subject is within that range, a reduction in the subject's assessment is not warranted. In rebuttal, the appellant distinguished the board of review's comparables based on location.

Conclusion of Law

The taxpayer asserts 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, and it is sufficient if the taxing authority achieves a reasonable degree of uniformity. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

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); 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 conviction of a crime. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). 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). 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2, #3, #4 and #6 and the board of review's comparables #1 and #4. These comparables had improvement assessments that ranged from \$17.84 to \$21.17 per square foot of living area. The subject's improvement assessment of \$21.00 per square foot of living area falls within the range established by the best comparables in this record. After considering all the comparables submitted by the parties with emphasis on those properties that are more proximate in location, more similar in size, and with similar features relative to the subject and after further considering adjustments to the best comparables for differences from the subject, the Board finds the subject's improvement assessment is supported. The Board finds that the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and, therefore, a reduction in the subject's assessment commensurate with the appellant's request 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: _____

October 21, 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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