



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

APPELLANT: Elizabeth Avina
DOCKET NO.: 23-21569.001-R-1
PARCEL NO.: 27-02-311-020-0000

The parties of record before the Property Tax Appeal Board are Elizabeth Avina, the appellant(s), 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, 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: \$10,125
IMPR.: \$61,844
TOTAL: \$71,969

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 13,500 square foot site improved with a two-story dwelling of masonry construction with 3,581 square feet of living area. The dwelling on the property is twenty years old. Features include a full basement, central air conditioning, one fireplace and a three-car garage. The property is located in Orland Park, Orland Township, Cook County and is classified as a 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on five suggested equity comparables with varying degrees of similarity to the subject property. The five properties offered by the appellant as comparables are each constructed of either frame/masonry or frame, have one fireplace, between a two-car and three-car garage, and range in size from 2,755 to 3,259 square feet of living area. Three of

the comparables have central air conditioning and two do not. Each has a full basement, one of which is unfinished. The comparables range in age from thirty-five to sixty-one years old. The record is silent on the proximity of the appellants' five comparables to the subject property. The comparables have improvement assessments ranging from \$8.13 to \$9.07 per square foot of living area. In addition, the appellant included a copy of the board of review's decision letter reflecting its valuation assessment for the subject property at \$71,969. The subject property has an improvement assessment of \$61,844 or \$17.27 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$41,458.

The board of review submitted its "Board of Review Notes on Appeal."¹ In support of its contention of the correct assessment, the board of review submitted information on four suggested equity comparables. The suggested comparable properties range in size from 3,131 to 3,460 square feet of living area. All of the board of review's suggested properties are constructed of either masonry or frame/masonry, have a three-car garage, central air conditioning, full basements and one or two fireplaces. The comparable properties range in age from twenty to twenty-two years old and have improvement assessments ranging from \$18.44 to \$18.75 per square foot of living area. The board of review reports that one of the comparables is located on the same block and three are located within a quarter mile of the subject property, and all in the same neighborhood code. Based on this evidence, the board of review requested that the assessment be confirmed.

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). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

¹ The board of review used the total assessment of the subject prior to board of review action, \$76,000, rather than the assessment after board of review action, \$71,969. The Board used the board of review's decision letter for the correct assessment and finds the correct improvement assessment to be \$61,844 and the correct improvement assessment per square foot to be \$17.27. This discrepancy was not significant for purposes of this decision.

The Board finds the best evidence of assessment equity to be the board of review's comparables #2, #3, and #4. These comparable properties had the most similar sized living areas, age, features and/or were closest in proximity to the subject property. The appellant's comparables #1 and #3 were afforded less weight due to not having central air conditioning, distinguishing them from the subject property. The appellant's comparables #2, #4, and #5 and the board of review's comparable #1 were afforded less weight due to having smaller square feet of living area than the subject property.

The best evidence comparables had improvement assessments of \$18.44 to \$18.75 per square foot of living area. The subject's improvement assessment of \$17.27 per square foot of living area falls under the range established by the best comparables in this record. After considering adjustments to these comparables for differences when compared to the subject, the Board finds the subject's improvement assessment is supported. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment 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: 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

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

APPELLANT

Elizabeth Avina, by attorney:
Dora Cornelio
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602