



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

APPELLANT: Tony Bovis
DOCKET NO.: 23-43109.001-R-1
PARCEL NO.: 03-32-407-011-0000

The parties of record before the Property Tax Appeal Board are Tony Bovis, the appellant, by Brian P. Liston, attorney-at-law of the Law Offices of Liston & Tsantilis, P.C. 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: \$6,600
IMPR.: \$25,410
TOTAL: \$32,010

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 6,600 square foot site improved with a multi-level dwelling of frame and masonry exterior construction that contains 1,381 square feet of living area. The dwelling is approximately 54 years old. Features of the property include a partial basement with a formal recreation room, central air conditioning, 2½ bathrooms and a 2-car garage. The property is in Arlington Heights, Wheeling Township, Cook County. The subject is a class 2-34 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 three equity comparables consisting of class 2-34 properties improved with multi-level dwellings of frame and masonry exterior construction that range in size from 1,299 to 1,379 square feet of living area. The homes are 54 to 56 years old. Each property has a partial basement, a 2-car or 2.5-car

garage, and 1, 1½ or 2 bathrooms. Two comparables have central air conditioning and one fireplace. These properties have the same neighborhood code as the subject property and are located within 367 feet of the subject. The comparables have improvement assessments ranging from \$22,032 to \$23,400 or \$16.96 and \$16.97 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$23,436.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$32,010. The subject property has an improvement assessment of \$25,410 or \$18.40 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 consisting of class 2-34 properties improved with multi-level dwellings of frame and masonry exterior construction that range in size from 1,341 to 1,397 square feet of living area and are 47 or 55 years old. Each property has a partial basement with a formal recreation room, central air conditioning, 1½ bathrooms and a 2-car garage. Three comparables each have one fireplace. The comparables have the same neighborhood code as the subject property and are in the same block or ¼ of a mile from the subject. These properties have improvement assessments ranging from \$26,400 to \$29,740 or from \$19.14 to \$22.18 per square foot of living area.

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

The parties submitted information on seven equity comparables with the same classification code and neighborhood code as the subject property. The comparables submitted by both parties are similar to the subject in size, construction and age. The comparables have varying degrees of similarity to the subject's features and would require adjustments to make them more equivalent to the subject property. The comparables have from ½ to 1½ less bathrooms than the subject necessitating upward adjustments to make them more equivalent to the subject for this difference. One comparable has no central air condition, a feature of the subject, requiring an upward adjustment. Conversely, five comparables each have one fireplace, unlike the subject, and one comparable has a larger garage than the subject, indicating downward adjustments for these differences would be proper. Nevertheless, the comparables have improvement assessments that range from \$22,032 to \$29,740 or from \$16.96 to \$22.18 per square foot of living area. The subject's improvement assessment of \$25,410 or \$18.40 per square foot of living area falls within the range established by the comparables in this record.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. *Apex Motor Fuel Co. v. Barrett*, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not all assessed at identical levels,

all that the constitution requires is a practical uniformity which exists based on the evidence in this record.

Based on this record, after considering the appropriate adjustments to the comparables, 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

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: June 16, 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

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