



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

APPELLANT: Daniel C. Busch
DOCKET NO.: 23-45547.001-R-1
PARCEL NO.: 28-30-306-015-0000

The parties of record before the Property Tax Appeal Board are Daniel C. Busch, the appellant, by attorney Andreas Mamalakis, of the Law Offices of Andreas Mamalakis in Kenosha; 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:

LAND: \$4,644
IMPR.: \$13,985
TOTAL: \$18,629

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 one-story dwelling of masonry exterior construction with 1,264 square feet of living area.¹ The dwelling is approximately 66 years old. Features of the property include a full basement, central air conditioning and a two-car garage. The property has a 10,320 square foot site and is located in Tinley Park, Bremen Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables that have the same

¹ The Board finds the only description of the subject property was provided by the appellant. The board of review's evidence erroneously depicts a different property with a property index number of 27-30-306-015-0000 as the subject of the appeal.

assessment neighborhood code as the subject and are located within .34 of a mile from the subject property. The comparables are class 2-03 properties improved with one-story dwellings of masonry exterior construction ranging in size from 1,404 to 1,471 square feet of living area. The dwellings are 69 or 74 years old. One comparable has a crawl space foundation and two comparables each have a partial basement and central air conditioning. Each comparable has one or two fireplaces and from a one-car to a three-car garage. The comparables have improvement assessments ranging from \$12,000 to \$15,959 or from \$8.16 to \$11.37 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement be reduced to \$12,160 or \$9.62 per square foot of living area.

The appellant submitted a copy of the Cook County Board of Review decision disclosing the subject's final assessment of \$24,211. The appellant also disclosed the subject has an improvement assessment of \$19,567 or \$15.48 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal." In support of its contention of the correct assessment the board of review submitted information on three equity comparables, none of which have the same assessment neighborhood code as the subject. The comparables are class 2-78 properties improved with two-story dwellings of frame and masonry exterior construction ranging in size from 2,293 to 2,661 square feet of living area. The dwellings are 31 or 34 years old. Each comparable has a full or partial basement and either a two-car or a three-car garage. One comparable has central air conditioning and two comparables each have a fireplace.

Conclusion of Law

The taxpayer 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted six comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparable #1 due to its lack of a basement foundation and central air conditioning, both features of the subject. The Board gives reduced weight to the board of review comparables which differ from the subject in location, dwelling size, design, age and/or features.

The Board finds the best evidence of assessment equity to be the appellant's comparables #2 and #3, which are overall more similar to the subject in location, dwelling size, design, foundation, age and some features. These two comparables have improvement assessments of \$12,012 and \$15,959 or \$8.29 and \$11.37 per square foot of living area. The subject's improvement assessment of \$19,567 or \$15.48 per square foot of living area falls above the two best comparables in the record. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's improvement assessment is excessive. Based on

this record, the Board finds the appellant did demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is warranted.

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: 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

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

APPELLANT

Daniel C Busch, by attorney:
Andreas Mamalakis
Law Offices of Andreas Mamalakis
4844 89th Place
Kenosha, WI 53142

COUNTY

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