



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

APPELLANT: Kerry Lynch
DOCKET NO.: 23-46150.001-R-1
PARCEL NO.: 18-07-100-015-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Kerry Lynch, the appellant, 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, PTAB hereby finds **No Change** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

LAND: \$13,668
IMPR.: \$87,500
TOTAL: \$101,168

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) contesting 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 2,887 square feet, two-story building of frame and masonry construction situated on a 10,125 square feet parcel in Hinsdale, Lyons Township, Cook County. The 22-year-old, class 2-78 residence under the Cook County Real Property Assessment Classification Ordinance featured central air conditioning, a two-car garage, at least three bathrooms, two fireplaces, and a full basement.¹

The appellant based the petition on assessment inequity, contending that the assessment should be lowered to \$22.19 per improvement square foot. As evidence of nonuniformity, the appellant selected five class 2-78 residences in the subject's neighborhood. These suggested comparables

¹ The Property Tax Appeal Board (PTAB) notes inconsistencies between the appellant's description of the subject and the board of review's description. After holistically considering all evidence in the record, PTAB concludes the discrepancies are immaterial to the outcome.

featured a two-car garage, at least two bathrooms, air conditioning, and a full basement. These potential comparators were between 41 and 56 years in building age; 2,921 and 3,141 square feet in improvement size; and \$20.90 and \$22.29 per living square foot in improvement assessment.

The board of review countered that the subject improvement assessment of \$87,500, or \$30.31 per living square foot, was equitable in its “Notes on Appeal.” In defense of the \$101,168 total subject assessment, the county board of review proposed four two-story improvements—three of which were within the subject’s subarea, and one of unknown distance from the subject—as equity comparables. The board of review’s preferred comparators all featured a full basement, a two- or three-car garage, at least 2.5 bathrooms, and air conditioning. These properties were 11 to 28 years in building age; 2,790 to 3,184 square feet in living area; and \$32.04 to \$34.71 per living square foot in improvement assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. The Illinois Constitution requires 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). Yet this uniformity provision of the Illinois Constitution does not mandate absolute equality in taxation; instead, a reasonable degree of uniformity in the taxing authority’s assessments suffices. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When the ground for appeal is unequal treatment in the assessment, 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 required for a criminal conviction. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). Proof of unequal treatment in the assessment should consist of documentation for the year in question of similarly situated properties of compelling proximity to, and with a lack of distinguishing characteristics from, the subject property. 86 Ill.Admin.Code §1910.65(b). The Property Tax Appeal Board (PTAB) finds the appellant fell short of satisfying this burden of proof.

As the properties most similar to the subject improvement area, board of review comparable #3 and appellant comparables #1 and #5 best represent the subject and thereby comprise the best evidence of assessment equity in this record. Board of review comparable #3 featured more living and garage space than the subject, which compensated for its one fewer fireplace and lesser bathroom functionality. On the other hand, appellant comparables #1 and #5 both contained slightly more living area than the subject, which somewhat mitigated the comparators’ fewer bathrooms and fireplaces. Given this record, the subject improvement would be equitably assessed from \$20.90 to \$32.04 per living square foot. Because the subject assessment of \$30.31 per improvement square foot is within the range of equitable assessments, PTAB concludes the appellant did not demonstrate inequitable subject assessment by clear and convincing evidence and a reduction 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:

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

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