



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

APPELLANT: Robert Wadach
DOCKET NO.: 23-47722.001-R-1
PARCEL NO.: 18-29-202-044-0000

The parties of record before the Property Tax Appeal Board are Robert Wadach, 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, 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: \$14,845
IMPR.: \$59,188
TOTAL: \$74,033

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 1.5-story dwelling of masonry exterior construction with 3,436 square feet of living area. The dwelling is approximately 15 years old. Features of the home include a basement with finished area, central air conditioning, two fireplaces and a 3-car garage. The property has an approximately 37,113 square foot site and is located in Countryside, Lyons Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables located in the same assessment neighborhood code as the subject property. The

comparables are improved with 1-story or 1.5-story class 2-04 dwellings¹ with a mixture of frame, masonry or stucco exterior construction ranging in size from 3,171 to 3,502 square feet of living area. The homes range from 15 to 75 years old. Each comparable has a basement, with two having finished area. Each dwelling has central air conditioning, one or two fireplaces and from a 2-car to a 4-car garage. The comparables have improvement assessments ranging from \$32,000 to \$42,480 or from \$9.66 to \$12.75 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$41,678 or \$12.13 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$74,033. The subject property has an improvement assessment of \$59,188 or \$17.23 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 located in the same assessment neighborhood code as the subject property. The comparables are improved with 1-story or 2-story class 2-04 or 2-78² dwellings of masonry or frame and masonry exterior construction ranging in size from 2,673 to 2,820 square feet of living area. The homes range from 24 to 27 years old. Each comparable has an unfinished basement, central air conditioning, one fireplace and a 2-car or a 3-car garage. The comparables have improvement assessments ranging from \$46,957 to \$55,992 or from \$17.57 to \$20.02 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 nine equity comparables for the Board's consideration. Four of the appellant's five comparables differ from the subject in age and/or design while the board of review's comparables are dissimilar to the subject in design and/or dwelling size.

Nevertheless, the parties' comparables have improvement assessments ranging from \$32,000 to \$55,992 or from \$9.66 to \$20.02 per square foot of living area. The subject's improvement assessment of \$59,199 or \$17.23 per square foot of living area falls above the range established by the comparables in this record on an overall improvement assessment basis and within the range on a per square foot basis. Given the subject's newer age and finished basement, relative to the properties in the record, a higher overall improvement assessment appears logical.

¹ The Board finds the best description of appellant comparable #2 was found in the Property Details printout which describes the dwelling to be 1.5-story in design.

² The Cook County Assessor's Office defines a class 2-04 property as a 1-story residence, any age, 1,801 square feet and over; and a class 2-78 property as a two-or-more story residence, up to 62 years of age, 2,001 to 3,800 square feet.

Therefore, after considering adjustments to the best comparables for differences from the subject, 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.

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 assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence in this record.

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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