



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

APPELLANT: Steve Stiso  
DOCKET NO.: 23-49048.001-R-1  
PARCEL NO.: 15-21-211-049-0000

The parties of record before the Property Tax Appeal Board are Steve Stiso, the appellant, by attorney John W. Zapala, of the Law Offices of John Zapala, 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:** \$4,690  
**IMPR.:** \$21,310  
**TOTAL:** \$26,000

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<sup>1</sup> of frame and masonry exterior construction with 1,539 square feet of living area. The dwelling is approximately 74 years old. Features of the home include a basement, central air conditioning and a 2-car garage. The property has a 6,700 square foot site and is located in Westchester, Proviso Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on both overvaluation and assessment inequity. The subject's land assessment was not challenged. The appellant submitted one grid analysis with

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<sup>1</sup> The Board finds the best description of the subject's design was found in the grid analysis submitted by the board of review which is further supported by the exterior photographs of the subject property and property characteristic printouts submitted by the appellant.

comparables #1 through #3 submitted in support of the overvaluation argument and comparables #4 through #7 submitted in support of the equity argument.

In support of the overvaluation argument, the appellant submitted three comparables sales located within 0.67 of a mile from the subject property. The comparables have sites with 6,650 square feet of land area and are improved with 1.5-story<sup>2</sup> class 2-03 dwellings of masonry or frame and masonry exterior construction ranging in size from 1,419 to 1,629 square feet of living area that are 69 to 74 years old. Each comparable has a basement and a 1-car, a 1.5-car or a 2-car garage. One property has central air conditioning and a fireplace. The comparables sold from August 2020 to January 2021 for prices ranging from \$241,500 to \$271,000 or from \$166.36 to \$181.82 per square foot of living area, land included.

For the equity argument, the appellant submitted information on four comparables located in the same neighborhood code as the subject property. The comparables are improved with 1-story class 2-03 dwellings of masonry or frame and masonry exterior construction ranging in size from 1,507 to 1,750 square feet of living area and are 74 to 78 years old. Each comparable has a basement, central air conditioning and a 2-car garage. The comparables have improvement assessments ranging from \$20,310 to \$22,590 or from \$12.91 to \$13.83 per square foot of living area.

The appellant also submitted a brief, photographs and printouts with property characteristics. In the brief the appellant argued the subject's 2023 assessment reflects an increase of 25.12% over the prior tax year and is excessive.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$22,599. The requested assessment reflects a total market value of \$225,990 or \$146.84 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The request would lower the subject's improvement assessment to \$17,909 or \$11.64 per square foot of living area.

The board of review submitted two copies of its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$26,000. The subject's assessment reflects a market value of \$260,000 or \$168.94 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The subject has an improvement assessment of \$21,310 or \$13.85 per square foot of living area.

In support of its contention of the correct assessment on market value grounds, the board of review submitted a grid analysis with information on three comparable sales located in the same assessment neighborhood code as the subject property. Board of review comparable #3 is the same property as the appellant's comparable #1. The comparables have sites with 6,650 or 6,700 square feet of land area and are improved with 1.5-story class 2-03 dwellings of frame and masonry exterior construction ranging in size from 1,434 to 1,688 square feet of living area and

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<sup>2</sup> The appellant submitted Property Characteristic information on the subject and each comparable which reported the residence type as 1.5-story in design.

are from 71 to 75 years old. Each comparable has a basement and a 1.5-car or a 2-car garage. One dwelling has central air conditioning. The comparables sold from November 2020 to April 2022 for prices ranging from \$241,500 to \$360,000 or from \$168.41 to \$213.27 per square foot of living area, land included.

In support of its contention of the correct assessment on equity grounds, the board of review submitted a second grid analysis with information on four comparables located in the same assessment neighborhood code as the subject property. Board of review comparable #3 is the same property as the appellant's comparable #4. The comparables are improved with 1.5-story class 2-03 dwellings of frame and masonry exterior construction ranging in size from 1,419 to 1,750 square feet of living area and are from 74 to 76 years old. Each comparable has a basement and a 2-car garage. Three dwellings have central air conditioning. The comparables have improvement assessments ranging from \$21,310 to \$22,590 or from \$12.91 to \$15.02 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, in part, the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains five comparable sales for the Board's consideration, as one property was common to both parties. The Board gives reduced weight to appellant comparables #2 and #3 along with board of review comparable #1 which sold in 2020, less proximate in time to the January 1, 2023 assessment date than other properties in the record.

The Board finds the best evidence of market value to be appellant comparable #1 and board of review comparables #2 and #3, including the parties' common property. These two comparables sold more proximate to the assessment date at issue and are similar to the subject in location, age, design, dwelling size and other features. These two comparables sold in January 2021 and April 2022 for prices of \$241,500 and \$360,000 or \$168.41 and \$213.27 per square foot of living area, including land. The subject's assessment reflects a market value of \$260,000 or \$168.94 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record. After considering adjustments to the best sale comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment, based on overvaluation is not justified.

The appellant also contends assessment inequity as an alternative 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, based on inequity is not warranted.

The record contains seven comparables in support of the inequity argument for the Board's consideration, as one property was common to both parties. The Board gives less weight to appellant comparable #4/board of review comparable #3 which is less similar to the subject in dwelling size than other properties in the record.

The Board finds the best evidence of assessment equity to be appellant comparables #5, #6 and #7 as well as board of review comparables #1, #2 and #4 which are more similar to the subject in location, age, design, dwelling size and other features. These comparables have improvement assessments that range from \$20,310 to \$22,450 or from \$12.96 to \$15.02 per square foot of living area. The subject's improvement assessment of \$21,310 or \$13.85 per square foot of living area falls within the range established by the best equity comparables in the record. Therefore, after considering adjustments to the best equity comparables for differences with the subject, the Board finds the subject's assessment is supported and no reduction, based on lack of uniformity, is warranted.

As a final point, the Board gave no weight to the argument raised by the appellant concerning the subject's increased fair market value based on assessment from 2022 to 2023. The Board finds rising or falling assessments from assessment year to assessment year on a percentage basis do not indicate whether a particular property is inequitably assessed. The Board finds assessors and boards of review are required by the Property Tax Code to revise and correct real property assessments that reflect fair market value, maintain uniformity of assessments and are fair and just. This may result in many properties having increased or decreased assessments from year to year of varying amounts and percentages depending on prevailing market conditions and prior year assessments along with the salient characteristics of a given property.

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:

May 19, 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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