FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Matthew Leonard
DOCKET NO.: 24-57039.001-R-1
PARCEL NO.: 14-32-211-015-0000

The parties of record before the Property Tax Appeal Board are Matthew Leonard, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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:	$57,660
IMPR.:	$296,189
TOTAL:	$353,849

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 2024 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 is improved with a three-story dwelling of masonry exterior construction containing 4,287 square feet of living area. The dwelling is approximately 10 years old. Features of the property include a full basement with finished area, central air conditioning, two fireplaces, and a 2.5-car garage. The property has a 3,720 square foot site located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on eight equity comparables composed of class 2-08 properties improved with two-story or three-story dwellings that range in size from 3,812 to 4,828 square feet of living area. The dwellings are from 9 to 25 years old. Each comparable has a full basement with seven having finished area, central air

conditioning, two fireplaces, and either a 2-car, a 2.5-car or a 3-car garage. These properties have the same assessment neighborhood code as the subject property and are located from 0.05 to 0.18 of a mile from the subject property. The comparables have improvement assessments ranging from $213,959 to $316,992 or from $53.57 to $65.66 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to $256,791.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $353,849. The subject property has an improvement assessment of $296,189 or $69.09 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 composed of class 2-08 properties improved with three-story buildings of masonry exterior construction that range in size from 3,829 to 4,235 square feet of living area. Each comparable has a full basement with a finished area, central air conditioning, one to four fireplaces, and either a 2-car or a 3-car garage. These properties have the same assessment neighborhood code as the subject and are located approximately ¼ of a mile from the subject. Their improvement assessments range from $282,191 to $315,760 or from $70.92 to $80.63 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 twelve equity comparables that have the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparable #2 and #5 due to differences in their dissimilar two-story design or unfinished basement area in relation to the three-story design and finished basement area of the subject property. The Board gives also less weight to appellant's comparables #1, #4, #6 and #7 as well as the board of review's comparable #1 which are less similar to the subject in dwelling size than the other comparables in the record.

The Board finds the best evidence of assessment equity to be appellant's comparables #3 and #8 along with the board of review's comparables #2, #3 and #4. These comparables are overall more similar to the subject in location, design, age, dwelling size, and basement finish, but still require adjustments for varying degrees of similarity in other features. These four comparables have improvement assessments that range from $230,338 to $315,760 or from $53.57 to $78.94 per square foot of living area. The subject's improvement assessment of $296,189 or $69.09 per square foot of living area falls within the range established by the best comparables in this record. Based on this record 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 the 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.

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:

C E R T I F I C A T I O N

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: November 17, 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 9-215 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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