



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

APPELLANT: Joseph Skom  
DOCKET NO.: 17-22958.001-R-1 through 17-22958.004-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Joseph Skom, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC 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:

<b>DOCKET NO</b>	<b>PARCEL NUMBER</b>	<b>LAND</b>	<b>IMPRVMT</b>	<b>TOTAL</b>
17-22958.001-R-1	05-18-212-012-0000	8,720	29,574	\$38,294
17-22958.002-R-1	05-18-212-024-0000	4,000	0	\$4,000
17-22958.003-R-1	05-18-212-036-0000	5,232	29,574	\$34,806
17-22958.004-R-1	05-18-212-038-0000	2,400	0	\$2,400

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 2017 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 four parcels. Parcel #1, identified as PIN 05-18-212-012-0000, and Parcel #3, identified as 05-18-212-036-0000, are improved with a two-story dwelling of frame and masonry exterior construction with 2,656 square feet of living area. The dwelling is approximately 70 years old. Features include a partial unfinished basement, central air conditioning, one fireplace, and a 2-car garage. Parcel #2, identified as 05-18-212-024-0000, and Parcel #4, identified as 05-18-212-038-0000, have a land assessment with no improvement assessment to the property. The four parcels have a combined 12,720 square foot site which are located in Winnetka, New Trier Township, Cook County. The subject is classified as a Class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement situated on Parcels #1 and #3 as the basis of the appeal. The land assessments for the four parcels were not contested. In support of this inequity argument, the appellant submitted information on four equity comparables that are located within the same neighborhood code as the subject. The comparables are improved with Class 2-06 dwellings of masonry, stucco, or frame and masonry exterior construction ranging in size from 2,296 to 3,066 square feet of living area. The comparables are 89 or 93 years old. Each comparable has a partial or full unfinished basement, one fireplace, and a 1-car or a 2-car garage. Two comparables each have central air conditioning. The comparables have improvement assessments ranging from \$43,200 to \$61,620 or from \$17.10 to \$20.64 per square foot of living area. Based on this evidence, the appellant requested within the "Addendum to Petition" the subject's improvement assessments for each of the two parcels be reduced to \$24,984 for Parcel #1 and \$25,878 for Parcel #3. The combined reduction of the improvement assessments for both parcels is \$50,862 or \$19.15 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total land and improvement assessments for the subject's four parcels of \$79,500. The subject property has a combined improvement assessment for Parcels #1 and #3 of \$59,148 or \$22.27 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 that are located within the same neighborhood code as the subject property. The comparables are improved with Class 2-06 dwellings of frame and masonry exterior construction ranging in size from 2,570 to 2,784 square feet of living area. The comparables range in age from 65 to 86 years old. Each comparable has one fireplace and a 1-car, a 1.5-car or a 2-car garage. Three comparables each have central air conditioning. The comparables have improvement assessments ranging from \$63,331 to \$79,323 or from \$24.49 to \$28.49 per square foot of living area. Based on this evidence, the board of review requested that the assessments of the four parcels be confirmed for the subject property.

### **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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

Initially, the Board finds only Parcels #1 and #3 have an improvement assessment so only the subject's improvement assessment will be analyzed for equity. The parties submitted eight suggested comparables for the Board's consideration. The Board gives less weight to the appellant's comparables and the board of review comparable #2 due to significant dissimilarities in the dwellings' ages and/or sizes when compared to the subject.

The Board finds the best evidence of assessment equity to be the board of review comparables #1, #3 and #4. These comparables are most similar to the subject in location, design, exterior

construction, age, dwelling size, and other features, but have finished basements, unlike the subject. These three comparables have improvement assessments ranging from \$63,331 to \$79,323 or from \$24.49 to \$28.49 per square foot of living area. The subject's combined improvement assessment of \$59,148 or \$22.27 per square foot of living area falls below the range of the best comparables in this record. After considering adjustments to the comparables for differences when compared to 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.

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: February 16, 2021



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

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