



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

APPELLANT: Jonathan Reinsdorf
DOCKET NO.: 18-20517.001-R-1
PARCEL NO.: 05-07-302-007-0000

The parties of record before the Property Tax Appeal Board are Jonathan Reinsdorf, the appellant, by attorney Noah J. Schmidt 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: \$34,125
IMPR.: \$118,489
TOTAL: \$152,614

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 2018 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 two-story dwelling of masonry exterior construction with 5,328 square feet of living area. The dwelling is approximately 100 years old.¹ Features of the home include a partial basement that is unfinished, central air conditioning, two fireplaces and a two-car garage. The property has a 22,750 square foot site and is located in Glencoe, New Trier Township, Cook County. The subject is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends improvement assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on five equity comparables that are located within the same neighborhood code as the subject. The comparables are improved with class 2-09 two-story dwellings of frame, masonry, stucco, or frame and masonry exterior construction

¹ The Board finds the best evidence of the subject dwelling's age was provided by the appellant.

ranging in size from 5,076 to 6,300 square feet of living area. The dwellings range in age from 79 to 103 years old. Based on the attached property characteristic sheets, each comparable has a full or partial basement, three of which have finished area, two comparables have central air conditioning and each comparable has one to six fireplaces and either a two-car or a three-car garage. The comparables have improvement assessments that range from \$89,025 to \$132,904 or from \$17.54 to \$21.10 per square foot of living area.

The appellant submitted a copy of the 2018 final decision issued by the Cook County Board of Review establishing a total assessment for the subject of \$152,614. The appellant reported that the subject property has an improvement assessment of \$118,489 or \$22.24 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$107,892 or \$20.25 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal," however the assessment data does not match the 2018 board of review decision submitted by the appellant. Furthermore, the "Board Review Notes on Appeal" indicates a tax year of 2012. In support of its contention of the correct assessment, the board of review submitted a grid analysis of the subject and three equity comparables, as board of review comparable #4 is a duplicate of board of review comparable #1. The comparables are located within the same assessment neighborhood code as the subject. The comparables are improved with class 2-09 two-story dwellings of masonry or frame and masonry exterior construction ranging in size 5,073 to 6,098 square feet of living area. The dwellings range in age from 45 to 84 years old. Each comparable has a partial basement, two of which have recreation rooms. The comparables each have either two or three fireplaces and from a two-car to a four-car garage. Two comparables have central air conditioning. The board of review reported that the comparables have improvement assessments that range from \$113,320 to \$209,239 or from \$28.65 to \$31.17 per square foot of living area. Based on this evidence, the board of review requested that the subject's assessment be confirmed.

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.

The parties submitted seven suggested comparables for the Board's consideration. The Board gives less weight to the appellant's comparable #5 due to its larger dwelling size. The Board gives reduced weight to the board of review comparables #1 and #3 due to their newer ages when compared to the subject dwelling. The Board finds the best evidence of assessment equity to be the parties' remaining comparables. These comparables are relatively similar to the subject in location, dwelling size, design and age, but have varying degrees of similarity in features. The comparables have improvement assessments ranging from \$89,025 to \$120,434 or from \$17.54 to \$22.34 per square foot of living area. The subject's improvement assessment of \$118,489 or

\$22.24 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments to the 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.

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: December 21, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Jonathan Reinsdorf, by attorney:
Noah J. Schmidt
Schmidt Salzman & Moran, Ltd.
111 West Washington Street
Suite 1300
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602