



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

APPELLANT: Mark Hosfield  
DOCKET NO.: 18-20676.001-R-1  
PARCEL NO.: 05-27-312-023-0000

The parties of record before the Property Tax Appeal Board are Mark Hosfield, 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:** \$27,808  
**IMPR.:** \$103,752  
**TOTAL:** \$131,560

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 stucco exterior construction with 3,144 square feet of living area. The dwelling is approximately 10 years old. Features of the home include a full unfinished basement, a fireplace and a two-car garage. The property has a 13,904 square foot site and is located in Wilmette, New Trier Township, Cook County. The subject is classified as a class 2-78 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 within the same assessment neighborhood code as the subject property. The comparables are improved with class 2-78 two-story dwellings of frame, masonry or frame and masonry exterior construction ranging in size from 2,823 to 3,012 square feet of living area. The

dwelling range in age from 38 to 59 years old. Based on the attached property characteristic sheets, one comparable has a concrete slab foundation, four comparables have a full or partial basement with one having a recreation room, four comparables have central air conditioning, four comparables each have one fireplace and each comparable has a two car garage. The comparables have improvement assessments that range from \$82,118 to \$88,652 or from \$29.09 to \$30.90 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$92,087 or \$29.29 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 \$131,560. The subject property has an improvement assessment of \$103,752 or \$33.00 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 within the same assessment neighborhood code as the subject property. The comparables are improved with class 2-78 two-story dwellings of frame or stucco exterior construction ranging in size from 3,011 to 3,494 square feet of living area. The dwellings range in age from 4 to 16 years old. The comparables each have a full basement, two of which have recreation rooms. Each comparable has central air conditioning, one or two fireplaces and either a one-car or a two-car garage. The comparables have improvement assessments that range from \$113,929 to \$140,370 or from \$33.38 to \$40.36 per square foot of living area. The board of review also reported that comparable #2 sold in July 2015 for a price of \$1,740,000, however, the Board finds this sales data is not responsive to the appellant's improvement assessment inequity argument. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 a total of nine equity comparables for the Board's consideration. The Board gives less weight to appellant's comparables due to their considerably older ages when compared to the subject dwelling. Furthermore, appellant's comparable #4 has a concrete slab foundation, in contrast to the subject's basement foundation.

The Board finds the best evidence of assessment equity to be the comparables provided by the board of review, which are similar to the subject in location, dwelling size, design, age and some features. These comparables have improvement assessments ranging from \$113,929 to \$140,370 or from \$33.38 to \$40.36 per square foot of living area. The subject's improvement assessment of \$103,752 or \$33.00 per square foot of living area falls below the range established by the best comparables in the record. After considering adjustments to the comparables for differences

when compared to the subject, the Board finds the subject's improvement assessment is supported. 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.

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.

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Chairman



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Member



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Member



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Member

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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: November 16, 2021



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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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