



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

APPELLANT: Joan Bentley Hoffman  
DOCKET NO.: 19-36170.001-R-1  
PARCEL NO.: 24-02-319-020-0000

The parties of record before the Property Tax Appeal Board are Joan Bentley Hoffman, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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:** \$4,092  
**IMPR.:** \$10,542  
**TOTAL:** \$14,634

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 2019 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-story dwelling of masonry exterior construction with 838 square feet of living area. The dwelling is approximately 59 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace, and a 2-car garage. The property has a 7,440 square foot site and is located in Evergreen Park, Worth Township, Cook County. The subject is classified as a class 2-02 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 four equity comparables that are located within the same neighborhood code as the subject property. The comparables are improved with class 2-02 dwellings of masonry exterior construction ranging in size from 856 to 987 square feet of living area. The comparables range in age from 62 to 77

years old. Each comparable has a basement with one having finished area. One comparable has central air conditioning. One comparable has one fireplace. Each comparable has a 1.5-car or a 2-car garage. The comparables have improvement assessments ranging from \$9,459 to \$10,541 or from \$10.40 to \$11.25 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$9,151 or \$10.92 per square foot of living area.

The appellant supplied a copy of the final decision for this parcel for tax year 2019 depicting a total assessment of \$14,634. The appellant's petition also disclosed that the subject has a land assessment of \$4,092 and an improvement assessment of \$10,542 or \$12.58 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing a different total assessment for the subject than the final decision provided by the appellant. Nevertheless, the board of review submitted information on four equity comparables with the same neighborhood code as the subject. The comparables are improved with 1-story or 1.5-story, class 2-02 dwellings of masonry or frame and masonry exterior construction ranging in size from 664 to 963 square feet of living area. The homes range in age from 69 to 79 years old. Each comparable has a basement with one having finished area. Two comparables each have central air conditioning. Two comparables each have one fireplace. Three comparables have either a 1.5-car or a 2-car garage. The comparables have improvement assessments that range from \$14,126 to \$18,316 or from \$19.02 to \$21.27 per square foot of living area. The board of review also disclosed in the grid that the subject sold in November 2019 for \$244,000. Based on this evidence, the board of review requested 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 eight suggested comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #2 and #3 as well as board of review's comparables #1, #2, and #3 which differ from the subject in design, age, basement finish, and/or dwelling size.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1 and #4 as well as board of review comparable #4 as they are overall more similar to the subject in location, design, age, and dwelling size. However, the appellant's comparable #1 and board of review comparable #4 lack central air conditioning while the appellant's comparable #4 lacks a fireplace, both features of the subject, suggesting upward adjustments for these differences would be needed to make them more equivalent to the subject. Nevertheless, these comparables

have improvement assessments that range from \$10,103 to \$17,946 or from \$10.40 and \$19.09 per square foot of living area. The subject's improvement assessment of \$10,542 or \$12.58 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 best 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.

Further, the subject's total assessment of \$14,634, reflecting an estimated market value of \$146,340, is well supported in light of the board of review's disclosure that the subject sold in November 2019 for a price of \$244,000, which was unrefuted by the appellant in rebuttal.

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: June 18, 2024



\_\_\_\_\_  
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

Joan Bentley Hoffman, by attorney:  
Robert Rosenfeld  
Robert H. Rosenfeld & Associates, LLC  
40 Skokie Blvd  
Suite 150  
Northbrook, IL 60062

COUNTY

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