



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

APPELLANT: Willard Shonfeld
DOCKET NO.: 20-22849.001-R-1
PARCEL NO.: 04-01-413-018-0000

The parties of record before the Property Tax Appeal Board are Willard Shonfeld, 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 **A Reduction** 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: \$25,621
IMPR.: \$43,702
TOTAL: \$69,323

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 2020 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 frame and masonry exterior construction with 3,555 square feet of living area. The dwelling is approximately 65 years old. Features of the home include a full unfinished basement, central air conditioning, one fireplace and a two-car garage. The property has an 18,979 square foot site and is located in Glencoe, 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparables with the same assessment neighborhood code as the subject. The comparables are class 2-06 properties with sites ranging in size from 11,280 to 24,300 square feet of land area and are improved with dwellings of masonry or frame and masonry exterior construction ranging in size from 2,488 to 4,314 square feet of living area.

The comparables are 65 to 137 years old and have partial or full basements, two of which have finished area. Each comparable has central air conditioning, one to three fireplaces and a 2-car garage. The comparables sold from November 2018 to February 2020 for prices ranging from \$474,901 to \$787,500 or from \$182.55 to \$197.35 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal". The appellant supplied a copy of the Board of Review Final Decision disclosing the total assessment for the subject of \$79,924. The subject's assessment reflects a market value of \$799,240 or \$224.82 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables which does not address the appellant's overvaluation argument and will not be further considered in this decision.

Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the only evidence of market value were the four comparable sales submitted by the appellant. The Board gives less weight to appellant's comparables #1 and #2 which have finished basement area unlike the subject and are 21% larger and 30% smaller in dwelling size than the subject, respectively.

The Board finds the best evidence of market value to be appellant's comparables #3 and #4 which are more similar in dwelling size (10% larger and 17% smaller, respectively) than the subject and have unfinished basements. However, the Board still recognizes adjustments to the comparables would have to be considered for the differences in site size, dwelling size, and age. These two comparables sold in November 2018 and April 2019 for prices of \$745,215 and \$580,000 or \$191.38 and \$197.35 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$799,240 or \$224.82 per square foot of living area, including land, which falls above the best comparable sales in this record both on overall market value and price per square foot bases. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's estimated market value reflected by the assessment is excessive. Based on this evidence, the Board finds the appellant proved by a preponderance of the evidence that a reduction in the subject's assessment is 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: _____

October 15, 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

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