



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

APPELLANT: Richard Young
DOCKET NO.: 20-22901.001-R-1 through 20-22901.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Richard Young, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-22901.001-R-1	05-17-107-038-0000	16,537	0	\$16,537
20-22901.002-R-1	05-17-107-050-0000	12,825	53,138	\$65,963

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 two parcels¹ with one parcel improved with a two-story dwelling of frame exterior construction with 2,826 square feet of living area. The dwelling is approximately 102 years old and has an unfinished basement. Features include one fireplace and a 2-car garage. The two parcels have a combined total site size of 13,050 square feet of land area that are located in Glencoe, New Trier Township, Cook County. Parcel #1 is a class 2-41 property that is vacant land adjacent to Parcel #2 that is a class 2-06 property improved with a residence under the Cook County Real Property Assessment Classification Ordinance.²

¹ For ease of reference, parcel number 05-17-107-038-0000 will be referred to as Parcel #1 and parcel number 05-17-107-050-0000 as Parcel #2.

² The grid analysis in Section V of the appellant's appeal petition disclosed the subject's two parcels have a combined total site size of 13,050 square feet of land area. The Board of Review – Notes on Appeal disclosed the classification codes for each of the two parcels.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales that have the same assessment neighborhood code as the subject. The comparables have sites ranging in size from 7,280 to 10,450 square feet of land area and are improved with class 2-06 dwellings of frame exterior construction ranging in size from 2,320 to 3,384 square feet of living area. The dwellings are from 98 to 109 years old. Each comparable has an unfinished basement, central air conditioning, one or two fireplaces, and either a 1-car, a 1.5-car or a 2-car garage. The properties sold from July 2018 to January 2020 for prices ranging from \$627,300 to \$825,000 or from \$236.41 to \$270.72 per square foot of living area, land included.

Based on this evidence, the appellant requested the subject's combined total assessment of both parcels be reduced to \$72,675 which reflects a market value of \$726,750 or \$257.17 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00%.

The appellant's submission included a copy of the "Cook County Board of Review" final decision for the 2020 tax year disclosing the subject has a total assessment of \$16,537 for Parcel #1 and \$75,107 for Parcel #2. The two parcels have a combined total assessment of \$91,644 which reflects a market value of \$916,440 or \$324.29 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00%.

The board of review submitted its "Board of Review Notes on Appeal" for only Parcel #2. In support of the assessment the board of review submitted information on four comparable sales that have the same assessment neighborhood code as the subject. The comparables have sites ranging in size from 7,200 to 13,782 square feet of land area and are improved with class 2-06 dwellings of frame and masonry, masonry, or stucco exterior construction ranging in size from 2,418 to 3,489 square feet of living area. The dwellings range in age from 77 to 103 years old. Each comparable has a basement, with two comparables having finished area, and one or two fireplaces. Three comparables each have central air conditioning, and three comparables have each have a 2-car garage. The comparables sold from February 2017 to August 2020 for prices ranging from \$755,000 to \$1,000,000 or from \$279.63 to \$341.19 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 record contains eight comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparable #1 and the board of review comparables which are less

similar to the subject in dwelling size, age, basement finish and/or have sale dates that occurred less proximate in time to the January 1, 2020 assessment date at issue than the other comparables in the record.

The Board finds the best evidence of market value to be the appellant's comparables #2, #3 and #4 which sold more proximate in time to the subject's assessment date and are similar to the subject in location, age, and some features. However, the Board finds these comparables have smaller site sizes and two comparables have smaller dwelling sizes when compared to the subject suggesting upward adjustments would be required to make these comparables more equivalent to the subject. These three comparables sold from March 2019 to January 2020 for prices ranging from \$627,300 to \$825,000 or from \$251.93 to \$270.72 per square foot of living area, including land. The subject's combined total assessment for the two parcels reflects an estimated market value of \$916,440 or \$324.29 per square foot of living area which falls above the three best comparables in this record. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's assessment is excessive. Therefore, based on this record the Board finds a reduction in the subject's assessment is warranted.

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

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

APPELLANT

Richard Young, 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