



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

APPELLANT: Steven Scheyer
DOCKET NO.: 20-23465.001-R-1
PARCEL NO.: 04-01-401-064-0000

The parties of record before the Property Tax Appeal Board are Steven Scheyer, 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 **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: \$51,148
IMPR.: \$65,880
TOTAL: \$117,028

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 1-story dwelling of frame exterior construction with 4,972 square feet of living area that is approximately 73 years old. Features of the home include a basement with finished area, central air conditioning, two fireplaces and a 2-car garage. The property has an approximately 37,888 square foot site and is located in Glencoe, New Trier Township, Cook County. The subject is classified as a class 2-04 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 located in the same assessment neighborhood code as the subject property. The comparables are improved with class 2-04 dwellings of frame or frame and masonry exterior construction ranging in size from 2,305 to 2,757 square feet of living area. The homes range in

age from 62 to 67 years old. Each comparable has a basement, with three having finished area. Each dwelling has central air conditioning and a 2-car garage. Three homes have either one or two fireplaces. The comparables have improvement assessments ranging from \$28,086 to \$32,709 or from \$11.83 to \$12.29 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$59,863 or \$12.04 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 \$125,141. The subject property has an improvement assessment of \$73,993 or \$14.88 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 in the same assessment neighborhood code as the subject property. The comparables are improved with 1-story or 1.5-story class 2-04 dwellings of masonry or frame and masonry exterior construction ranging in size from 3,172 to 4,991 square feet of living area. The homes range in age from 13 to 65 years old. Each comparable has a basement, with one having finished area. Each dwelling has central air conditioning, one to three fireplaces and a 2-car garage. Comparable #4 has other improvements not further described. The comparables have improvement assessments ranging from \$42,041 to \$81,002 or from \$12.28 to \$24.82 per square foot of living area. 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted eight equity comparables for the Board's consideration. The Board gives less weight to each of the appellant's comparables all of which are more than 40% smaller in dwelling size relative to the subject. The Board gives less weight to board of review comparable #3 which differs from the subject in design and is substantially newer in age when compared to the subject.

On this limited record, the Board finds the best evidence of assessment equity to be board of review comparables #1, #2 and #4 which are similar to the subject in location, age, design and some features. However, two of these best comparables are more than 35% smaller in dwelling size and each has an unfinished basement when compared to the subject's dwelling size and finished basement, suggesting upward adjustments are needed to make these comparables more equivalent to the subject. The Board finds board of review comparable #4 to be most similar to the subject in age, design and dwelling size which has an improvement assessment of \$61,312 or \$12.28. These three comparables have improvement assessments ranging from \$42,041 to \$61,312 or from \$12.28 to \$14.64 per square foot of living area. The subject's improvement

assessment of \$73,993 or \$14.88 per square foot of living area falls above the range established by the best comparables in this record. After considering adjustments to the comparables for differences from the subject, the Board finds the appellant demonstrated with clear and convincing evidence that the subject's improvement was inequitably assessed and 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

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