



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

APPELLANT: Caryn Rosen Adelman
DOCKET NO.: 20-27110.001-R-1
PARCEL NO.: 05-17-307-038-0000

The parties of record before the Property Tax Appeal Board are Caryn Rosen Adelman, the appellant, by attorney Andrew J. Rukavina, of The Tax Appeal Company in Mundelein, the Cook County Board of Review, the New Trier H.S.D. # 203 intervenor, by attorney Scott L. Ginsburg of Robbins Schwartz in Chicago.

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: \$86,202
IMPR.: \$129,086
TOTAL: \$215,288

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 is improved with a two-story, single-family dwelling of frame and masonry construction with a three-car garage and 5,910 square feet of living area located in Winnetka, New Trier Township, Cook County. The dwelling is 100 years old. Features include a full, unfinished basement, a three-car garage, central air conditioning, seven fireplaces, four full bathrooms, and two half baths. The subject is located on a 38,312 square foot site. It is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal estimating the subject property had a market value of \$1,309,500, land included, as of January 1, 2019. The appraiser relied on the sales comparison

approach and used data from sales of four suggested comparable properties and a then-current listing of a fifth suggested comparable. The sales took place between October 2017 and August 2018 for amounts ranging from \$1,010,000 to \$1,637,500 or from \$202.94 to \$287.47 per square foot of living area, land included in the sales prices. The fifth suggested comparable was listed for \$2,690,000, or \$394.25 per square foot of living area, land included. The appraiser adjusted the sales prices to account for differences between the subject and the comparables. Photographs of the subject dwelling's interior and exterior were included with the appraisal.

The board of review submitted its "Board of Review Notes on Appeal" stating that the subject's total assessment was \$215,288. The subject's assessment reflects a market value of \$2,152,880, or \$364.28 per square foot of living area, land included, when using the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2 property of 10%. The board of review also submitted a grid sheet with information about three suggested comparable properties. Those properties were sold between January 1, 2018, and November 1, 2019, for amounts ranging from \$2,075,000 to \$3,725,000, or between \$363.52 and \$611.66 per square foot of living area, land included in the sales prices.

New Trier High School District No. 203 intervened and submitted information from Multiple Listing Service (MLS) about sales of six suggested comparable properties, all located in Winnetka. Those properties were sold between January 2017 and August 2019 for amounts ranging from \$2,152,880 to \$3,040,000, or from \$380.93 to \$525.22 per square foot of living area, land included in the sales prices. The intervenor asserted that the suggested comparable properties used in the appellant's appraisal were dissimilar to the subject for several reasons, including their lot sizes.

In rebuttal, the appellant asserted that the board of review's suggested comparables were dissimilar to the subject in that their dwellings were not nearly as old as the subject dwelling, and all had finished basements, unlike the subject dwelling. Additionally, two of the comparables had dwellings of masonry construction while the subject dwelling was of frame and masonry construction.

This matter was set for hearing before an Administrative Law Judge on July 21, 2025, but the parties agreed to waive the hearing and stand on the documentary evidence they had submitted.

Conclusion of Law

The appellant contends that 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); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

There is some confusion in the record about the subject property's living area. The board of review's grid sheet says that it is 6,651 square feet, but the appellant's appraisal lists the

subject's gross living area as 5,910 square feet, and the intervenor agrees with that figure. The record reveals that the inspector inspected the property, so the Board finds that the subject dwelling's living area was 5,910 square feet.

This Board gives little weight to the appraisal submitted by the appellant primarily because of the high gross and/or net adjustment percentages for some of the comparable properties upon which the appraiser relied. A gross adjustment percentage is calculated by first determining the sum of the absolute values of all adjustments made by the appraiser to account for differences between the subject and the comparable. The total is then divided by the sale price of the comparable to determine the gross adjustment percentage for the comparable. A net adjustment percentage is calculated in the same manner except that an upward adjustment is treated as a positive number and a downward adjustment is treated as a negative number.¹

The appraisal's first comparable has a high net adjustment percentage of 19.9%. The appraisal's second and third comparables have high gross adjustment percentages of 45.7% and 56.3% respectively. These high net and gross adjustment percentages indicate that these comparables are not similar enough to the subject to be of use in determining the subject's market value. Furthermore, the appraisal contains the listing price but no sales data for the fifth comparable, so this Board discounts that comparable.

The Board finds that the best evidence of the subject's value is the appraisal's suggested comparable four and the intervenor's comparables one, two, three, and six. Like the subject dwelling, each of these comparables has a single-family dwelling with central air conditioning, a multi-car garage, at least one fireplace, and a basement. The dwellings on these comparables are similar to the subject dwelling in age and living area size. They are all located in Winnetka.

These comparables were sold between October 2017 and June 2019 for amounts ranging from \$1,010,000 to \$3,040,000, or between \$209.28 and \$525.22 per square foot of living area, land included in the sales prices. The subject's appraised value represents a fair market value of \$364.28 per square foot of living area, which is within this range. It is also below the fair market values of four of these five best comparables as reflected by their sales prices.

Accordingly, the appellant has failed to show overvaluation by a preponderance of the evidence, so no reduction in the subject's assessment is warranted.

¹ For example, if the appraiser makes an upward adjustment of \$20,000 and a downward adjustment of \$10,000, the gross adjustment amount is \$30,000, and the net adjustment amount is \$10,000. Assuming the comparable was recently sold for \$200,000, the gross adjustment percentage would be 15% and the net adjustment percentage would be 5%.

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: _____

January 20, 2026



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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