



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

APPELLANT: Nick Jacobs
DOCKET NO.: 20-28140.001-R-1
PARCEL NO.: 05-27-418-016-0000

The parties of record before the Property Tax Appeal Board are Nick Jacobs, the appellant(s), by attorney Joanne Elliott, of Elliott & Associates Attorneys, PLLC in Des Plaines; 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: \$39,072
IMPR.: \$96,428
TOTAL: \$135,500

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 16,280 square foot parcel with two improvements. One improvement is described as a 106-year-old, single family dwelling of masonry construction. Features of this improvement include a full finished basement with a formal recreation room, four full bathrooms, and two fireplaces. The second improvement is described in a submitted MLS listing as a coach house over the heated garage with two bedrooms, a kitchen, bathroom, laundry, and loft space. The property is located in Wilmette, New Trier Township, Cook County. The subject is classified as a class 2-06 and 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence in the form of a settlement statement, sales contract and MLS listing

disclosing the subject property was purchased on June 14, 2019, for a price of \$1,355,000. Based on this evidence, the appellant requested a reduction in the subject's total assessment.

In a brief entitled Summary of Relief Requested appellant argues that the median level of assessment for the subject should be reduced from 10% to 8.33% based on a recent sales ratio study performed by the Illinois Department of Revenue for class 2 properties in Cook County¹. Based on this argument, the appellant requested a reduction in the subject's total assessment to \$112,871.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$135,500. The subject's assessment reflects a market value of \$1,355,000, land included, when applying the 10% Cook County Real Property Assessment Classification Ordinance.

Conclusion of Law

When market value is the basis of the appeal, the taxpayer must prove the value of the property 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 appellants *did not meet* this burden of proof and a reduction in the subject's assessment on this basis *is not* warranted.

As a preliminary matter, the Board accords no weight to the appellant's argument that the Illinois Department of Revenue's recent sales-ratio study median level of assessment of "8.33%" of recent sales prices should apply to the subject. The appellant did not provide any supplemental reports, material, or any evidence confirming their assertion that the median level of assessment was what they purported it to be. Scant argument alone, without supporting evidence, is insufficient to grant a reduction based on the level of assessment. Accordingly, the Board will apply the assessment level as established by the Cook County Real Property Assessment Classification Ordinance of 10% to any market value established by the Board.

The Board now turns to the appellants' recent sale argument. Illinois law requires that real estate be valued for property tax purposes at "market value". The sales price of property in an arms-length transaction is conclusive evidence of market value (see *People ex. Re Korzen v. Belt Railway Company*, 37 Ill. 2d 265 (1967) where the Court stated; "(i)t goes without saying that a contemporaneous sale between parties dealing at arms-length is not only relevant to the question of fair cash value, but would be practically conclusive on that issue". The appellants presented evidence that the subject property was sold on June 14, 2019, for a price of \$1,355,000. The appellant provided information in Section IV-Recent Sale Data of the appeal that the parties to the transaction were not related; that the property was sold using a Realtor; and that the property had been advertised on the open market for 67 days. In further support of the transaction, the appellant submitted a copy of the settlement statement. There was no evidence from the parties that the subject

¹ Appellant submitted an Illinois Department of Revenue document titled "2020 Cook County Tentative Multiplier Announced" as evidence in support of the reduction in the median level of assessment for the subject.

was sold pursuant to a short sale or from a foreclosure. The Board finds the purchase price was within the market value reflected by the assessment. Based on this record, the Board finds the subject property had a market value of \$1,355,000. as of January 1, 2020, and that a reduction in the subject's assessment is not justified. Since market value has been determined, the 2020 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance shall apply.

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: _____

February 18, 2025



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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