



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

APPELLANT: Brandon Boyewsky
DOCKET NO.: 20-35262.001-R-1 through 20-35262.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Brandon Boyewsky, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld and Associates, LLC in Chicago; 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
20-35262.001-R-1	04-25-313-021-0000	3,737	19,282	\$23,019
20-35262.002-R-1	04-25-313-022-0000	3,737	25,709	\$29,446
20-35262.003-R-1	04-25-313-023-0000	3,737	19,282	\$23,019

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 three parcels improved with a two-story dwelling of frame and masonry exterior construction with 3,108 square feet of living area. The dwelling is approximately 12 years old. Features of the home include a full basement with finished area, central air conditioning, one fireplace and a 2-car garage. The property has a combined 9,750 square foot site and is located in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-78 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 neighborhood code as the subject property. The comparables

are improved with class 2-78 dwellings of frame and masonry exterior construction ranging in size from 2,857 to 3,685 square feet of living area. The dwellings range in age from 19 to 52 years old. The comparables each have a full basement, two of which have finished area. Each comparable has central air conditioning, one fireplace and from a 2-car to a 3-car garage. The comparables have improvement assessments ranging from \$54,760 to \$79,930 or from \$19.05 to \$21.69 per square foot of living area. Based on this evidence, the appellant requested that the subject's total improvement assessment be reduced to \$64,273 or \$20.68 per square foot of living area.

The appellant submitted a copy of the final decision of the Cook County Board of Review dated February 3, 2020 for the 2019 assessment year concerning the three parcels which depicts assessments of \$29,137 for Parcel #1 (PIN 04-25-313-021-0000), \$37,603 for Parcel #2 (PIN 04-25-313-022-0000) and \$29,137 for Parcel #3 (PIN 04-25-313-023-0000). The subject's three parcels have a combined total assessment of \$95,877 and a total improvement assessment of \$84,666 or \$27.24 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" providing assessment information on only one parcel under appeal. In support of its contention of the correct assessment, the board of review submitted information on two equity comparables that are located in the same neighborhood code as the subject property. However, the Board finds comparable #1 is the same property as the appellant's comparable #2.¹ Comparable #2 is improved with a class 2-78 dwelling of frame exterior construction with 3,769 square feet of living area and is 4 years old. This comparable has a full basement with finished area, central air conditioning, one fireplace and a 2-car garage. The comparable has an improvement assessment of \$142,011 or \$37.68 per square foot of living area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

The Board further finds that the board of review comparable #1 has a different assessment than reported by the appellant. This discrepancy will not affect the Board's decision.

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 five suggested comparables for the Board's consideration, including the parties' common comparable. The Board gives less weight to the appellant's comparable #2/board of review #1 due to its older age when compared to the subject. The Board gives less

¹ The parties each reported a different assessment for the common comparable. The Board notes this difference will not affect its decision in this appeal.

weight to the board of review comparable #2 which appears to be an outlier with its significantly larger improvement assessment when compared to the other comparables in the record.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1, #3 and #4 which are relatively similar to the subject in dwelling size and some features. These comparables have improvement assessments ranging from \$54,760 to \$79,930 or from \$19.05 to \$21.69 per square foot of living area. The subject's total improvement assessment of \$84,666 or \$27.24 falls above the range established by the best comparables in this record and is excessive. After considering adjustments to the best comparables for differences when compared to 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 commensurate with the appellant's request 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:

February 15, 2022



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

Brandon Boyewsky, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld and Associates, LLC
33 North Dearborn Street
Suite 1850
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602