



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

APPELLANT: Matthew Saltzman  
DOCKET NO.: 20-38160.001-R-1  
PARCEL NO.: 04-25-200-084-0000

The parties of record before the Property Tax Appeal Board are Matthew Saltzman, the appellant, 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:** \$24,095  
**IMPR.:** \$150,905  
**TOTAL:** \$175,000

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 two-story dwelling of stucco exterior construction with 5,366 square feet of living area. The dwelling was constructed in 2019 and is approximately 1 year old.<sup>1</sup> Features of the home include a full basement with finished area, central air conditioning, two fireplaces and a 2-car garage. The property has an approximately 20,909 square foot site and is located in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-09 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 disclosing the subject property was purchased on August 28, 2019 for a price of \$1,750,000. The appellant indicated in Section IV–Recent Sale Data of the appeal petition

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<sup>1</sup> The appellant provided the MLS listing sheet associated with the purchase of the subject property which disclosed the dwelling was completed in February 2019.

that the subject property was purchased from 2015 Wagner LLC, the parties to the transaction were not related, the property was sold by a realtor and was advertised with the Multiple Listing Service (MLS). The appellant submitted a copy of the listing sheet which disclosed the property had been advertised for 102 days. To document the sale the appellant provided a copy of the settlement statement reiterating the sale date and purchase price and further depicted that commissions were paid to one realty agency.

Counsel for the appellant also submitted a brief that contended the recent sales ratio studies performed by the Illinois Department of Revenue conclude that Class 2 property in Cook County experienced a three-year median level of assessment of 8.33% of the recent sales. In support of this claim, the appellant submitted a copy of the 2020 Cook County Tentative Multiplier Announcement.

Based on the foregoing evidence and argument, the appellant requested a reduction in the subject's assessment of \$145,775 to reflect the three-year median level of assessment of 8.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$175,000. The subject's assessment reflects a market value of \$1,750,000 or \$326.13 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable properties that are located within the same block or subarea as the subject property, two of which have the same assessment neighborhood code as the subject. Sales data was provided for comparables #1 and #2. Since no sales data was provided for comparables #3 and #4 to address the appellant's overvaluation argument, these two properties will not be further considered in this analysis. The board of review's comparables #1 and #2 have the same property classification code as the subject and have sites that contain 44,736 and 64,164 square feet of land area, respectively. The comparables are improved with two-story dwellings of masonry or frame and masonry exterior construction with 5,447 or 5,889 square feet of living area. The dwellings are 13 and 77 years old, respectively. Each comparable has a full unfinished basement, central air conditioning, three or four fireplaces and either a 3-car or a 3.5-car garage. The comparables sold in May and October 2018 for prices of \$2,400,000 and \$3,245,000 or for \$440.61 and \$551.03 per square foot of living area, including land. The board of review also indicated the subject property was purchased in September 2019 for \$1,750,000.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

As an initial matter, the Board gives no weight to the appellant's median level of assessment argument as the tentative multiplier announcement is insufficient in establishing the median level of assessment.

The Board finds the best evidence of market value to be the purchase of the subject property in August 2019 for a price of \$1,750,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The evidence disclosed the property was sold using a realtor and the property had been advertised for sale. In further support of the transaction, the appellant submitted a copy of the settlement statement and MLS listing sheet associated with the purchase of the subject property. The Board finds the board of review did not present any substantive evidence to challenge the arm's length nature of the subject's sale transaction. In addition, the assessing officials did not refute the contention that the purchase price was reflective of market value. The Board finds the purchase price of \$1,750,000 is equal to the market value of \$1,750,000 as reflected by the assessment. Furthermore, the Board finds the board of review's comparables sold less proximate to the lien date at issue and differ from the subject in site size, dwelling size and age. Therefore, based on this record, the Board finds the subject property had a market value of \$1,750,000 as of the assessment date at issue. Since market value has been established the 2020 statutory level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00% shall apply. 86 Ill.Admin.Code §1910.50(c)(2). Based on this evidence, the Board finds no change 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: \_\_\_\_\_

August 20, 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

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