



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

APPELLANT: David W. Hardesty
DOCKET NO.: 20-40186.001-R-1
PARCEL NO.: 04-10-201-050-0000

The parties of record before the Property Tax Appeal Board are David W. Hardesty, the appellant, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; 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: \$12,833
IMPR.: \$71,963
TOTAL: \$84,796

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 2-story dwelling of frame and masonry exterior construction with 4,076 square feet of living area. The dwelling was built in 1958 and is approximately 62 years old. Features of the home include a basement, central air conditioning, two fireplaces, and a 2-car garage. The property has a 12,222 square foot site located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales with the same assessment neighborhood code as the subject. The comparables have sites that range in size from 12,155 to 40,113 that are improved with single family dwellings ranging in size from 3,336 to 4,907 square feet of living area. The homes were built from 1931 to 1973 and thus would range in age from

47 to 89 years old. Each comparable has a basement with finished area, central air conditioning, either one or two fireplaces, and a 2-car garage. The properties sold from April to August 2019 for prices ranging from \$525,000 to \$795,000 or from \$116.33 to \$197.84 per square foot of living area, land included. Based on the foregoing evidence, the appellant requested the subject's assessment be reduced to \$66,037 reflecting a market value of \$660,370 or \$162.01 per square foot of living area, land included, when applying the level of assessment for a class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$84,796. The subject's assessment reflects a market value of \$847,960 or \$208.04 per square foot of living area, land included, when applying the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

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. The finds the equity comparables submitted by the board of review are unresponsive to the appellant's overvaluation argument and will not be analyzed any further in this decision. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In written rebuttal, the appellant's counsel opined that the board of review comparables are not recent sales. The appellant also provided two grid analyses, one of both parties' comparables and the second with the appellant's opinion of the best comparables. Based on the evidence presented, the appellant's counsel argued that the subject was overassessed and a reduction as requested by the appellant was warranted.

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 proven 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). Based on the limited evidence in this record, a reduction in the subject's assessment is not warranted.

The Board finds the only evidence of market value are the three comparable sales provided by the appellant. The Board finds the best evidence of market value in this record to be the appellant's comparable #1 which is most similar to the subject in age and dwelling size but has a significantly larger lot size than the subject and has basement finish, which is not a feature of the subject, as well as having varying degrees of similarity in other features. However, the Board finds this sole comparable sale does not by itself provide sufficient evidence to establish the market value of the subject property. The Board finds the appellant's comparables #2 and #3 have basement finish, unlike the subject, as well as considerable differences in age and dwelling size when compared to the subject. Based on the limited evidence in this record, the Board finds a reduction in the subject's estimated market value based on its assessment is not warranted,

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

AGENCY

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