



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

APPELLANT: Christopher Douglass  
DOCKET NO.: 21-20435.001-R-1  
PARCEL NO.: 05-17-414-018-0000

The parties of record before the Property Tax Appeal Board are Christopher Douglass, the appellant, by attorney Robert Rosenfeld of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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:

**LAND:** \$21,093  
**IMPR.:** \$45,689  
**TOTAL:** \$66,782

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 2021 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 masonry exterior construction with 2,318 square feet of living area. The dwelling is approximately 117 years old. The home features a full unfinished basement, two full bathrooms, one half bathroom, two fireplaces and a 1-car garage. The property has a 9,375 square foot site and is located in Winnetka, New Trier Township, Cook County. The subject is classified as a class 2-06 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 that have the same assessment neighborhood code and property classification code as the subject. The comparables are improved with dwellings of masonry exterior construction ranging in size from 2,283 to 2,452 square feet of living area. The dwellings are from 81 to 97

years old. Each comparable has a full basement. No data was provided by the appellant concerning finished basement area. Each comparable has central air conditioning, two full bathrooms and either a 1-car, a 2-car or a 2½-car garage. Two comparables each have an additional half bathroom and three comparables each have one or two fireplaces. The comparables have improvement assessments that range from \$43,551 to \$49,376 or from \$19.08 to \$20.24 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$72,385. The subject property has an improvement assessment of \$51,292 or \$22.13 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located either within the same block or approximately ¼ of a mile from the subject property and three comparables are also located on the same street as the subject. The comparables are improved with two-story dwellings of frame or frame and masonry exterior construction ranging in size from 2,421 to 3,837 square feet of living area. The dwellings are from 92 to 116 years old. The comparables each have a full or partial basement, one of which has finished area. Three comparables have central air conditioning. Each comparable has from two to four full bathrooms, one or two half bathrooms, a fireplace and either a 1-car, a 2-car or a 3½-car garage. Comparable #3 reportedly has other improvements but the board of review did not provide a description of these improvements. The comparables have improvement assessments that range from \$64,654 to \$88,771 or from \$22.54 to \$27.79 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 eight comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparable #3 as the dwelling is 36 years newer in age when compared to the subject. The Board has given reduced weight to board of review comparables #1, #3 and #4 due to their larger dwelling sizes when compared to the subject. The Board has also given reduced weight to board of review comparable #2 which appears to be an outlier due to its considerably higher improvement assessment of \$67,270 or \$27.79 per square foot of living area relative to the other comparables in the record.

The Board finds the best evidence of assessment equity to be the appellant's comparables #1, #2 and #4, which are similar to the subject in location and dwelling size. However, these three comparables are superior to the subject dwelling in that each dwelling has central air conditioning and are either 20 years or 23 years newer in age, suggesting downward adjustments for these differences would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables have improvement assessments ranging from \$43,551 to \$49,376 or from \$19.08 to \$20.24 per square foot of living area. The subject's improvement assessment of \$51,292 or \$22.13 per square foot of living area falls above the range established by the best comparables in the record, which appears to be excessive given the subject dwelling's older age and lack of central air conditioning. Therefore, after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's total 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.

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Chairman

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Member

Member

\_\_\_\_\_  
Member

Member

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Member

Member

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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: March 18, 2025

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Clerk of the Property Tax Appeal Board

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

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