



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

APPELLANT: Douglas Hart
DOCKET NO.: 21-21298.001-R-1
PARCEL NO.: 05-28-112-019-0000

The parties of record before the Property Tax Appeal Board are Douglas Hart, the appellant, by Amy C. Floyd, attorney-at-law 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 **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: \$14,070
IMPR.: \$45,939
TOTAL: \$60,009

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 is improved with a two-story dwelling of frame and masonry exterior construction that contains 1,959 square feet of living area. The dwelling is approximately 79 years old. Features of the property include a full basement with a formal recreation room, two fireplaces, 2½ bathrooms, and a 2-car garage. The property has a 6,700 square foot site located in Wilmette, New Trier Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on four equity comparables composed of class 2-05 properties improved with two-story dwellings of frame and masonry exterior construction that range in size from 1,618 to 2,152 square feet of living area and in age from 72 to 82 years old. Each comparable has a full or partial basement, and one fireplace. The comparables have one or two full bathrooms and three comparables have an

additional ½ bathroom. The appellant did not disclose whether the comparables have garages. These properties have the same neighborhood code as the subject property. These properties have improvement assessments that range from \$24,862 to \$36,525 or from \$14.48 to \$16.97 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$30,815.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$60,009. The subject property has an improvement assessment of \$45,939 or \$23.45 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 composed of class 2-05 properties of frame and masonry exterior construction that range in size from 1,540 to 2,016 square feet of living area and in age from 69 to 83 years old. Each comparable has a full basement with three having finished area, one or two fireplaces, and a 1-car or a 1.5-car garage. The comparables have two or three full bathrooms and three comparables have an additional one or two half bathrooms. Three comparables have central air conditioning. The comparables have the same assessment neighborhood code as the subject property and are located in the same block or ¼ of a mile from the subject property. These properties have improvement assessments that range from \$41,832 to \$49,885 or from \$24.07 to \$30.68 per square foot of living area. The board of review contends the building assessed value per square foot for the comparables are equal or higher than the subject, which supports the correctness of the assessment.

Conclusion of Law

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

The parties submitted information on eight assessment equity comparables to support their respective positions. The comparables have the same classification code and neighborhood code as the subject property as well as being similar to the subject dwelling in age. The Board gives less weight to appellant's comparable #2 and board of review comparable #3 due to differences from the subject in dwelling size. Appellant's comparables #1, #3 and #4 are relatively similar to the subject in dwelling size but the appellant did not disclose whether these comparables have finished basement area or a garage, as does the subject property, which detracts from the Board's ability to determine the degree of similarity these properties have to the subject; therefore, less weight is given these comparables. The Board finds the best evidence of assessment equity to be board of review comparables #1, #2 and #4 that are improved with dwellings that range in size from 1,738 to 2,016 square feet of living area and in age from 69 to 83 years old. The properties have varying degrees of similarity to the subject in features. These three comparables have improvement assessments that range from \$41,832 to \$49,885 or from \$24.07 to \$24.74 per square foot of living area. The subject's improvement assessment of \$45,939 or \$23.45 per square foot of living area falls within the range of the total improvement assessments but is

below the range on a per square foot of living area basis as established by the best comparables in this record. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not 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

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: March 18, 2025

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

AGENCY

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