



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

APPELLANT: Scott Stone
DOCKET NO.: 21-21439.001-R-1
PARCEL NO.: 05-06-313-038-0000

The parties of record before the Property Tax Appeal Board are Scott Stone, the appellant, by attorney Thomas J. Boyle, of Crane and Norcross LLC in Chicago,¹ 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: \$17,820
IMPR.: \$49,916
TOTAL: \$67,736

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 frame exterior construction with 2,048 square feet of living area. The dwelling is approximately 126 years old. Features of the home include a full unfinished basement, 2 bathrooms, central air conditioning, and one fireplace. The property has a 13,200 square foot site and is located in Glencoe, 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 assessment inequity concerning the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on five equity

¹ During the course of this proceeding, a motion for substitution of counsel was granted removing the representation of Dora Cornelio.

comparables² located in the same neighborhood code as the subject. The appellant supplied property characteristics printouts with additional data concerning basement, basement finish and half-bath features which have been added for clarity. The comparables consist of class 2-05 two-story dwellings of frame, stucco, or frame and masonry exterior construction. The dwellings range in age from 68 to 109 years old and range in size from 1,920 to 2,188 square feet of living area. Each comparable has a full or partial basement, two of which have formal recreation rooms. Features include 1 to 3 bathrooms with two comparables having 1 and 2 half-baths. Two comparables have central air conditioning and four comparables each have a fireplace. Each comparable has from a 1-car to a 2.5-car garage. The comparables have improvement assessments ranging from \$24,188 to \$31,958 or from \$12.53 to \$14.61 per square foot of living area.

Based on this evidence, the appellant requested a reduced improvement assessment of \$49,916 or \$24.37 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$84,414. The subject property has an improvement assessment of \$66,594 or \$32.52 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on three equity comparables located in the same neighborhood code as the subject and the same block as the subject. The comparables consist of class 2-05 two-story dwellings of stucco or masonry exterior construction that range in age from 96 to 131 years old. The homes range in size from 1,808 to 2,020 square feet of living area. Each comparable has a full or partial unfinished basement and 2½ bathrooms. Comparable #3 has central air conditioning and two comparables each have a fireplace as well as a two-car and a three-car garage, respectively. The comparables have improvement assessments ranging from \$29,715 to \$34,660 or from \$14.78 to \$19.17 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 a total of eight equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #2, #3, #4 and #5 along with board of review comparable #1, due to differences in

² For ease of reference, the Board has renumbered the last property to comparable #5.

age ranging from 68 to 97 years old as compared to the 126-year-old subject. In addition, board of review comparable #1 is approximately 12% smaller than the subject dwelling.

The Board finds the best evidence of assessment equity in the record to be appellant's comparable #1 as well as board of review comparables #2 and #3, which are relatively similar to the subject in location, age, dwelling size, basement foundation and finish along with some other features. Two of the best comparables necessitate downward adjustments for their garage features when compared to the subject which does not have a garage. Upward adjustments are needed for board of review comparable #2 which lacks air conditioning and a fireplace in order to make the property more equivalent to the subject. Two properties need downward adjustments for bathroom count and each comparable differs slightly from the subject in age and dwelling size. The Board finds these best comparables have improvement assessments ranging from \$27,056 to \$32,918 or from \$12.53 to \$16.30 per square foot of living area. The subject's improvement assessment of \$66,594 or \$32.52 per square foot of living area is above the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of living area basis.

After considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did demonstrate 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

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

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