FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Jacob Tacher
DOCKET NO.: 21-38901.001-R-2 through 21-38901.002-R-2
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Jacob Tacher, the appellant(s), by attorney Brian S. Maher, of Weis, DuBrock, Doody & Maher 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 ***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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-38901.001-R-2	04-18-100-027-0000	31,544	0	$31,544
21-38901.002-R-2	04-18-300-002-0000	20,000	37,500	$57,500

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 has two PINs. PIN -027 is classified as a Class 2-41 vacant land property and PIN -002 is classified as a Class 2-04 residential property under the Cook County Real Property Assessment Classification Ordinance. The subject property has a 58-year-old, one-story, single-family dwelling of frame and masonry construction with 2,598 square feet of living area. Features of the home include a partial basement, central air conditioning, and a two-car garage. The property (including the vacant lot on PIN -027) is on a two-acre lot located in Northbrook, Northfield Township, Cook County.

The appellant submitted a Cook County Board of Review valuation decision which showed the assessed value of PIN -002 to be $136,167 and PIN -027 to be $31,544.

The appellant's appeal is based on overvaluation, specifically based on a recent sale and an appraisal. In support of the recent sale argument the appellant submitted evidence disclosing the subject property was purchased on March 15, 2022, for a price of $575,000. The appellant answered the questions in Section IV of the residential appeal, submitted a warranty deed, and a Multiple Listing Service closing data sheet. The answers from Section IV of the residential appeal indicated that the sale of the subject property was not between family members, was sold by using a realtor, was advertised on the Multiple Listing Service, and was not due to a foreclosure action. The appellant did not answer how long of a period the subject property was advertised for. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect 10% of the purchase price.

The appellant also supports their overvaluation contention based on an appraisal. In support of this argument the appellant submitted an appraisal of PIN -002 estimating that PIN -002 had a market value as of February 28, 2022, of $575,000 utilizing the sales comparison approach. The appraiser examined four comparable sales, making adjustments to the properties based on differences between the subject and the suggested comparables. The appraisal was written and signed by a licensed appraiser who submitted their credentials with the report. The appraisal report does not address PIN -027.

The board of review submitted a partially completed "Board of Review Notes on Appeal" which did not disclose the assessed value. The board of review did not submit any evidence, legal brief, or any argument whatsoever in support of their contention that the subject property was accurately assessed and that the subject property assessment should not be lowered.

Prior to a scheduled February 14, 2025, hearing before a PTAB Administrative Law Judge the parties entered into a written agreement to waive hearing and have a decision rendered based on the previously submitted evidence.

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 met this burden of proof and a reduction in the subject's assessment is warranted under the appraisal basis.

The Board gives little weight to the 2018 sale of the subject property because the record does not establish that the sale was an arm’s-length transaction. Section IV of the residential appeal form requires the appellant to provide the length of time the subject property was advertised on the open market; however, the appellant failed to provide this information. Additionally, the record contains no Multiple Listing Service closing data sheet for the subject property, which would ordinarily supply details regarding market exposure. As a result, the appellant submitted no conclusive evidence demonstrating whether, or for how long, the property was exposed to the open market.

Illinois law requires that all real property "shall be valued at its fair cash value, estimated at the price it would bring at a fair voluntary sale." (Ill. Rev. Stat. 1971, ch. 120, par. 501.) Fair cash value is generally synonymous with fair market value: the price a willing seller and a willing buyer would agree upon in a voluntary transaction, with neither party under compulsion. (See, *e.g., People ex rel. McGaughey v. Wilson (1937), 367 Ill. 494, 12 N.E.2d 5*.) This standard is rooted in an objective measure of value determined by marketplace forces at a given place and time.

The Property Tax Appeal Board finds the absence of evidence showing adequate open-market exposure prevents the 2022 sale from being considered an arm's-length transaction reflective of fair cash value. Although the board of review failed to submit evidence supporting its position that the assessment was correct, the appellant still bore the burden of proving overvaluation by a preponderance of the evidence. With respect to the recent sale, the appellant did not meet this burden.

The Board finds the appraisal to be the most reliable evidence of market value. The appraisal utilized the sales comparison approach to determine market value. The appraisal was written and signed by a licensed appraiser who submitted their credentials with the report. The appraiser used their experience and expertise to make adjustments to the sales data to make comparisons to PIN -002. In contrast, the board of review submitted no evidence, no legal brief, and no written arguments. The board of review also chose to waive their right to a hearing and to conduct cross-examination on the appellant's appraiser. Without opposing evidence or argument, the appraisal satisfied the appellant's burden of proof by a preponderance of the evidence in showing market value. The Board finds the market value of PIN -002 to be $575,00, consistent with the appraiser's conclusions. After finding the market value of the subject property, the 10% assessment level for Class 2 property under the Cook County Real Property Assessment Classification Ordinance shall apply to PIN -002.

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:

<u>CERTIFICATION</u>

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: September 15, 2026

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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Jacob Tacher, by attorney:
Brian S. Maher
Weis, DuBrock, Doody & Maher
1 North LaSalle Street
Suite 1500
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602