



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

APPELLANT: James McCoskey
DOCKET NO.: 21-46352.001-R-1
PARCEL NO.: 18-07-100-010-0000

The parties of record before the Property Tax Appeal Board are James McCoskey, the appellant, by attorney Joanne Elliott of Elliott & Associates Attorneys, PLLC in Des Plaines; 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: \$23,500
IMPR.: \$69,248
TOTAL: \$92,748

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 stucco exterior construction with 3,304 square feet of living area. The dwelling is approximately 63 years old. The home features a full basement that is finished with a recreation room,¹ four full bathrooms, one half bathroom, central air conditioning, a fireplace and a 2.5-car garage. The property has a 20,000 square foot site and is located in Hinsdale, Lyons 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

¹ The board of review disclosed the subject dwelling has a full basement that is finished with a recreation room, which was not refuted by the appellant.

as the subject. The comparables are located from .18 to .89 of a mile from the subject property. The comparables are improved with two-story dwellings of frame or frame and masonry exterior construction ranging in size from 3,163 to 3,480 square feet of living area. The dwellings are from 65 to 67 years old. Each comparable has a partial unfinished basement, central air conditioning, two or three full bathrooms, one or two fireplaces and a 2-car garage. Three comparables each have either one or two additional half bathrooms. The comparables have improvement assessments that range from \$45,556 to \$58,836 or from \$14.40 to \$18.32 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$55,275 or \$16.73 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 \$92,748. The subject property has an improvement assessment of \$69,248 or \$20.96 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 approximately ¼ of a mile from the subject property or within the subject's subarea. The comparables are improved with two-story dwellings of stucco, masonry or frame and masonry exterior construction ranging in size from 3,345 to 3,692 square feet of living area. The dwellings are from 67 to 90 years old. The comparables each have a full or partial basement, three of which are finished with a formal recreation room. Three comparables have central air conditioning. Each comparable has two or three full bathrooms, one or two half bathrooms, one or two fireplaces and either a 2-car or a 3-car garage. The comparables have improvement assessments that range from \$81,877 to \$125,716 or from \$23.94 to \$34.05 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted eight comparable properties for the Board's consideration. The Board has given less weight to board of review comparable #1, which appears to be an outlier due to its significantly higher improvement assessment of \$125,716 or \$34.05 per square foot of living area, when compared to the improvement assessments of the other comparables in the record.

The Board finds the appellant's comparables and board of review comparables #2, #3 and #4 have the same assessment neighborhood code as the subject and are similar to the subject dwelling in size and design. However, the Board finds all the appellant's comparables are inferior to the subject dwelling in bathroom count, basement finish and garage capacity, whereas

board of review comparables #2, #3 and #4 are inferior to the subject dwelling in age, bathroom count and garage capacity. Additionally, board of review comparable #3 has an unfinished basement and board of review comparable #4 lacks central air conditioning, both features of the subject. These differences suggest upward adjustments would be required to make the comparables more equivalent to the subject. Conversely, the appellant's comparable #2, as well as board of review comparables #3 and #4 each have an additional fireplace, suggesting a downward adjustment for this difference would be necessary. Nevertheless, the comparables have improvement assessments ranging from \$45,556 to \$89,687 or from \$14.40 to \$26.69 per square foot of living area. The subject's improvement assessment of \$69,248 or \$20.96 per square foot of living area falls within the range established by the best comparables in the record. Based on this record and after considering adjustments to the best comparables for differences when compared to the subject, 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

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: _____

April 15, 2025



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

James McCoskey, by attorney:
Joanne Elliott
Elliott & Associates Attorneys, PLLC
1430 Lee Street
Des Plaines, IL 60018

COUNTY

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