FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: James Forsythe Building Fund
DOCKET NO.: 22-22041.001-R-1
PARCEL NO.: 01-09-204-023-0000

The parties of record before the Property Tax Appeal Board are James Forsythe Building Fund, the appellant(s), by attorney Michael R. O'Malley, of Schmidt Salzman & Moran, Ltd. 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:	$62,730
IMPR.:	$331,902
TOTAL:	$394,632

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 2022 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 construction with 14,028 square feet of living area located in Barrington Hills, Barrington Township, Cook County. The building is approximately 18 years old. Features of the dwelling include a full basement, central air conditioning, and a one-car garage. The subject is located on a 627,308 square foot site. It is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as a basis of the appeal. In support of this argument, the appellant submitted an appraisal estimating the subject property had a market value of $3,500,000 as of January 1, 2022. The appraiser relied on the sales comparison approach in which he used sales of five comparable properties in Barrington Hills and South Barrington that took place between August 2016 and March 2020 for amounts ranging from $2,000,000 to

$4,900,000, or from $181.81 to $384.14 per square foot of living area, land included in the sales prices. The appraiser claimed to adjust the sales prices to account for differences between the subject and the comparables, but did not include the adjustments made. Photographs of the subject dwelling's interior were included with the appraisal. In addition, the appellant submitted a copy of the board of review's decision letter reflecting its total valuation assessment for the subject property of $394,632. Based on the evidence submitted, the appellant requested a reduction in the subject property's total assessment to $350,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $394,633. The subject's assessment reflects a market value of $3,946,330 or $281.32 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%. The board of review noted that there are a lack of comparable sales to the subject and argued that the assessment should be confirmed, because the appellant's appraisal used sales comparables that are too old to be considered and the appraisal fails to disclose any adjustments made to the comparables used.

In support of the assessment, the board of review submitted sales information for three suggested comparable properties. The suggested comparables were sold between April 2020 and August 2022 for amounts ranging from $2,950,000 to $4,050,000 or between $331.16 and $384.14 per square foot of living area, land included in the sales prices. These comparables were located in either Barrington Hills or South Barrington. Based on this evidence, the board of review requested that the assessment be confirmed.

This matter was previously set for hearing. Prior to the hearing date, the parties submitted a written request to waive hearing and have this matter written on the evidence previously submitted. The administrative law judge granted the parties' request.

Conclusion of Law

The appellant contends that 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); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the appraisal report sales comparable #5 and the board of review's comparable sales #1, #2, and #3. These comparables sold between March of 2020 and August of 2022 for prices ranging from $331.16 to $384.14 per square foot of living area, including land. They were most similar to the subject property in location, age, and/or had sales dates closest to the lien year in the instant appeal.

The appraisal submitted by the appellant employed the sales comparison approach, relying upon sales of five suggested comparable properties in Barrington Hills and South Barrington. Four of the comparables sold in either 2016 or 2017, over four years from the effective date of the appraisal, January 2022. Additionally, the appraiser claimed to make adjustments to account for differences between the subject and the comparables but failed to provide percentages or dollar amounts for any adjustments on the comparables to arrive at a market price for the subject.

The subject's assessment reflects a market value of $281.32 per square foot of living area, including land, which is below the range established by the best comparable sales in this record. Based on this record the Board finds the appellant did not demonstrate by a preponderance of the 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:

C E R T I F I C A T I O N

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

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