



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

APPELLANT: Eric Fosse
DOCKET NO.: 22-22370.001-R-1
PARCEL NO.: 04-01-410-001-0000

The parties of record before the Property Tax Appeal Board are Eric Fosse, the appellant, by attorney Jeremy Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$24,192
IMPR.: \$95,808
TOTAL: \$120,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely appealed a Cook County Board of Review decision 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 accordingly finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property includes a 4,086 square feet, multi-level dwelling of masonry construction built on a 13,440 square feet parcel of land in Glencoe, New Trier Township, Cook County. The 70-year-old residence, which is considered a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance, contains 3.5 bathrooms, central air conditioning, a fireplace, and an attached two-car garage.

Arguing the subject's improvement assessment of \$23.45 per living square foot is inequitably high, the appellant requested the Board reduce the subject improvement assessment to \$83,763, or \$20.50 per living square foot. In support of this reduction, the appellant offered four class 2-34 properties as equity comparables. The comparables were all at least .9 miles away from the subject property, featured air conditioning, and ranged from \$18.35 to \$23.01 per square foot of living space in improvement assessment.

The county board of review maintained the subject improvement was appropriately assessed at \$95,808, or \$23.45 per square foot in its “Board of Review Notes on Appeal.” To support its total assessment of \$120,000 for the subject, the board of review provided information on three properties within a quarter mile of the subject as equity comparables. The board of review’s selections, which had improvement assessments between \$25.44 and \$28.75 per square foot of living area, all included a two-car garage, a partial basement, and at least one fireplace.

Conclusion of Law

The taxpayer contends assessment inequity on appeal. The Illinois Constitution requires real estate taxes “be levied uniformly by valuation ascertained as the General Assembly shall provide by law.” Ill. Const., art. IX, § 4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). Yet this uniformity provision of the Illinois Constitution does not require absolute equality in taxation; instead, a reasonable degree of uniformity in the taxing authority’s assessments suffices. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When unequal treatment in the assessment is the basis of the appeal, the appellant must prove the inequity of the assessments by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Proof of unequal treatment in the assessment process should consist of assessment documentation for the 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.

The Board finds that the board of review submitted the best comparables in this record. Not only was each board of review comparable closer to the subject than any of the appellant’s selections, the properties also identically matched the subject in terms of basement quality and garage size. By contrast, the appellant’s best comparable, comparable #4, contained one fewer bathroom and a smaller garage than the subject in addition to being farther. The Board finds that the subject’s current improvement assessment of \$23.45 per improvement square foot falls below the equitable range established by the best comparables in this record. Accordingly, the Board concludes the appellant did not show by clear and convincing evidence that the subject improvement assessment was inequitably high and therefore a reduction in the 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: _____

September 16, 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

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