



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

APPELLANT: Andrew Knight  
DOCKET NO.: 22-22725.001-R-1  
PARCEL NO.: 05-06-406-028-0000

The parties of record before the Property Tax Appeal Board are Andrew Knight, the appellant, by attorney Richard Shapiro, Attorney at Law in Evanston; 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:** \$25,988  
**IMPR.:** \$62,011  
**TOTAL:** \$87,999

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 consists of a 2.5-story dwelling of masonry exterior construction with 3,649 square feet of living area.<sup>1</sup> The dwelling was constructed in 1921 and is approximately 101 years old. Features of the home include a full basement, central air conditioning, a fireplace, and a 2-car garage. The property has an 11,243 square foot site and is located in Glencoe, New Trier 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal of the subject property estimating the subject property had a market value of \$790,000 as of April 27, 2022. The appraisal was prepared by Kevin Maloney, a

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<sup>1</sup> The Board finds the appraisal with the April 27, 2022 effective date submitted by the appellant, which contains a detailed property sketch with measurements, to be the best evidence of dwelling size in the record.

certified general real estate appraiser. The purpose of the appraisal was to determine the market value of the subject property for a refinance transaction.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value by examining six comparable sales located from .08 of a mile to 1.56 miles from the subject. The comparables are improved with 2-story dwellings ranging in size from 3,107 to 4,368 square feet of living area. The dwellings range from 70 to 101 years old. Each dwelling has one to three fireplaces, a basement with four having finished area, and a 2-car garage. Four comparables have central air conditioning. The parcels range in size from 8,346 to 14,432 square feet of land area. The sales occurred from July 2019 to April 2021 for prices ranging from \$710,000 to \$900,000 or from \$198.03 to \$284.44 per square foot of living area, including land. Adjustments were made to comparables #1 and #3 for financing concessions. Adjustments were then applied for differences between the comparables and the subject property for condition, site size, dwelling size, bathroom count, basement finish, and other features to arrive at adjusted prices ranging from \$777,600 to \$821,950. Based on this data, the appraiser arrived at a market value of \$790,000 or \$216.50 per square foot of living area, including land, as of April 27, 2022.

The appraiser reported that comparable #2 was a short sale, but stated that no adjustment was necessary because the property was marketed normally. The appraiser also noted that the appraised value was 20% above the subject's March 2020 purchase price of \$655,000, and that the appraised value is a higher level of appreciation than expected for a home in need of major updating, concluding that the owners purchased the property for below market value in 2020.

The appellant also submitted a comparative sale analysis prepared for Fannie Mae by Bozena Zurek opining an "As-is Sale Price" of \$735,000 as of the report date of November 4, 2021. Although the appellant's brief refers to this analysis as an appraisal, the addendum to the report states that "This document is not an appraisal as defined by USPAP (Uniform Standards for Professional Appraisal Practice). It is not to be construed as an appraisal and may not be used as such for any purpose. This is a broker price opinion/comparative analysis, not an appraisal of the market value of the real estate, and was prepared by a licensed real estate broker or managing broker who was not acting as a State certified real estate appraiser." Nevertheless, the broker analyzed three comparable sales and three listings. The comparables are improved with 1-story or 2-story dwellings ranging in size from 2,722 to 3,934 square feet of living area. The dwellings range from 52 to 152 years old. Each dwelling has central air conditioning, a basement with five having finished area, and a 1-car, 2-car, or 3-car garage. The parcels range in size from approximately 8,712 to 16,988 square feet of land area. The sales occurred from April to October 2021 for prices ranging from \$710,000 to \$799,000 or from \$180.00 to \$274.00 per square foot of living area, including land. The remaining comparables were listed for prices ranging from \$745,000 to \$780,000.<sup>2</sup> Based on this data, the broker arrived at a market value of \$735,000 or \$201.43 per square foot of living area, including land, as of November 4, 2021.

The appellant requested the subject's assessment be reduced to reflect the appraised value.

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<sup>2</sup> Listing #3 is the same property as appraisal comparable #2, which was reported to have sold in January 2022 for \$710,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$87,999. The subject's assessment reflects a market value of \$879,990 or \$241.16 per square foot of living area, land included, when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located within the subject's assessment neighborhood and within .25 of a mile of the subject. Comparable #4 is the same property as appraisal comparable #5, which sold twice. The comparables consist of 2-story class 2-06 dwellings of stucco, frame, or frame and masonry exterior construction ranging in size from 3,414 to 3,998 square feet of living area. The dwellings range in age from 100 to 111 years old. Each dwelling has central air conditioning, one or two fireplaces, and a full basement. Two comparables each have a 1-car or 2-car garage. Comparable #2 was reported to have "other improvements," which were not further disclosed. The parcels range in size from 10,456 to 24,505 square feet of land area. The comparables sold from March 2020 to October 2022 for prices ranging from \$1 to \$1,419,000 or from \$0.00 to \$383.51 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellant submitted an appraisal and a comparative sale analysis, and the board of review submitted four comparable sales for the Board's consideration. The Board gives less weight to the value conclusion in the appraisal submitted by the appellant, which relied on sales that occurred in 2019 and 2020, less proximate to the January 1, 2022 assessment date at issue in this appeal. Likewise, the Board gives little weight to the value conclusion in the comparative sale analysis presented by the appellant, which is not an appraisal and was not prepared by a licensed appraiser. The Board will instead examine the raw sales in the record.

The Board gives reduced weight to the sales contained in the appraisal, which differ from the subject in age, location, and/or sold less proximate to the assessment date at issue. Similarly, the Board gives less weight to the sales presented in the comparative sale analysis, which differ from the subject in age, location, design, and/or dwelling size. The Board also gives diminished weight to board of review comparables #2 and #3, which each sold for \$1, calling into question the arm's length nature of these sales.

The Board finds the best evidence of market value to be the board of review comparables #1 and #4, which sold proximate to the assessment date at issue and are similar to the subject in age, location, design, dwelling size, and most features. These two most similar comparables sold in January and May 2022 for prices of \$1,094,768 and \$1,419,000 or for \$273.83 and \$383.51 per square foot of living area, including land. The subject's assessment reflects a market value of

\$879,990 or \$241.16, which is below the best evidence of market value in this record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds 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: \_\_\_\_\_

August 19, 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

Andrew Knight, by attorney:  
Richard Shapiro  
Attorney at Law  
990 Grove St.  
Suite 409  
Evanston, IL 60201

COUNTY

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