FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Thomas Borders
DOCKET NO.: 22-23186.001-R-1
PARCEL NO.: 05-17-103-022-0000

The parties of record before the Property Tax Appeal Board are Thomas Borders, the appellant, by attorney Hannah 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 ***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:

LAND:	$44,000
IMPR.:	$116,000
TOTAL:	$160,000

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 brick exterior construction with 5,689 square feet of living area.[1] The dwelling was constructed in 1912 and has a chronological age of 110 years old. Features of the home include a basement with finished area, central air conditioning, two fireplaces and a 2-car garage. The property has a 20,000 square foot site and is located in Winnetka, New Trier Township, Cook County. The subject is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity with respect to the improvement assessment as the bases of the appeal. The subject's land assessment was not challenged.

[1] The Board finds the best description of the subject's design and dwelling size was found in the appellant's appraisal which contains a detailed sketch with measurements, which was not refuted by the board of review.

In support of the overvaluation argument the appellant submitted an appraisal estimating the subject property had a market value of $1,600,000 as of November 29, 2021. The appraisal was prepared by Steven S. Rabin, a Certified Residential Real Estate Appraiser. The intended use of the appraisal report was to support a refinance transaction for the lender/client, BMO Harris – CLC.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting three comparable sales located from 0.09 to 0.63 of a mile from the subject property. The comparables have sites that range in size from 15,900 to 23,920 square feet of land area and are improved with 2-story or 2.5-story dwellings of Q2 quality construction that range in size from 4,085 to 6,736 square feet of living area. The homes are from 76 to 102 years old. Each comparable has a basement with finished area, central air conditioning and a 2-car garage. The comparables sold from January to July 2021 for prices ranging from $1,499,000 to $1,699,000 or from $243.62 to $366.95 per square foot of living area, land included.

After adjusting comparable #2 for sale or financing concessions, the appraiser adjusted the comparables for differences from the subject in location, room count, dwelling size and finished basement amenities arriving at adjusted sale prices of the comparables ranging from $1,533,330 to $1,855,790 and an opinion of market value for the subject of $1,600,000.

The appellant also contends assessment inequity with respect to the improvement as an additional basis of the appeal. In support of this argument the appellant submitted information on four equity comparables located in the same assessment neighborhood code as the subject property. The comparables are improved with 2-story class 2-09 dwellings of stucco or frame exterior construction ranging in size from 5,081 to 5,810 square feet of living area. The homes range from 61 to 118 years old. Each comparable has a basement, central air conditioning, one to three fireplaces and a 2-car or a 3-car garage. The comparables have improvement assessments ranging from $110,461 to $138,400 or from $21.74 to $24.64 per square foot of living area.

Based on this evidence, the appellant requested the subject's total assessment be reduced to $160,000. The requested assessment reflects a total market value of $1,600,000 or $281.24 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% when using a dwelling size of 5,689 square feet of living area. The request would lower the subject's improvement assessment to $116,000 or $20.39 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 $178,000. The subject's assessment reflects a market value of $1,780,000 or $312.88 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% and a dwelling size of 5,689 square feet of living area. The subject has an improvement assessment of $134,000 or $23.55 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted a grid analysis with information on four comparable properties. One comparable sold for $1.00 in

September 2021, which does not appear to reflect a market value transaction. The board of review's four equity comparables are located in the same assessment neighborhood code and within ¼ of a mile from the subject property. The comparables are improved with 2-story class 2-09 dwellings of frame or masonry exterior construction ranging in size from 5,068 to 5,259 square feet of living area. The homes are from 19 to 113 years old. Each comparable has a basement, central air conditioning, two to four fireplaces and from a 2-car to a 3-car garage. Comparable #1 has "other improvements" not further described. The comparables have improvement assessments ranging from $147,570 to $198,572 or from $29.12 to $37.91 per square foot of living area, land included. Based on this evidence, the board of review requests the subject's assessment be confirmed.

Conclusion of Law

The appellant contends, in part, 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.

With respect to the appellant's overvaluation argument, the appellant submitted an appraisal and the board of review submitted one comparable sale. The Board gives little weight to the board of review's comparable sale as its $1.00 sale price does not appear to reflect market value.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The subject's assessment reflects a market value of $1,780,000 or $312.88 per square foot of living area, including land, which falls above the appraised value. The Board finds the subject property had a market value of $1,600,000 as of the assessment date at issue. Based on this evidence the Board finds a reduction in the subject's assessment, based on overvaluation, is justified. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment classification ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2)).

The taxpayer also contends assessment inequity as an alternative 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). After considering the reduction to the subject's assessment on the basis of overvaluation, the Board finds a further reduction in the subject's assessment based on equity 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: July 21, 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

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