



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

APPELLANT: Robert Mann and Jamie Baum
DOCKET NO.: 22-23704.001-R-1
PARCEL NO.: 05-07-303-027-0000

The parties of record before the Property Tax Appeal Board are Robert Mann and Jamie Baum, the appellants, by attorney Thomas E. Sweeney of Siegel Jennings Co., LPA 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: \$47,335
IMPR.: \$144,522
TOTAL: \$191,857

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 two-story dwelling of stucco exterior construction with 4,650 square feet of living area. The dwelling is approximately 105 years old. Features of the home include a partial basement with finished area,¹ five full bathrooms, two half bathrooms, central air conditioning, two fireplaces and a 3-car garage. The property has a 21,516 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 appellants contend assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellants submitted information on five equity comparables that have the same assessment neighborhood code and property classification code

¹ The board of review disclosed the subject dwelling has a formal recreation room in the basement, which was not refuted by the appellants.

as the subject. The comparables are located along the same street as the subject property or less than a mile from the subject. The comparables are improved with two-story dwellings of frame, masonry or stucco exterior construction ranging in size from 4,498 to 4,970 square feet of living area. The dwellings are from 97 to 110 years old. The comparables each have a full or partial basement, two of which have finished area. No data was provided by the appellants concerning basement finish, if any, for comparables #2, #4 and #5. Each comparable has from three to five full bathrooms, one additional half bathroom, central air conditioning and one or two fireplaces. Four comparables each have either a 2-car or a 2.5-car garage. The comparables have improvement assessments ranging from \$65,710 to \$143,067 or from \$14.03 to \$29.27 per square foot of living area. Based on this evidence, the appellants requested the subject's improvement assessment be reduced to \$107,927 or \$23.21 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 \$191,857. The subject property has an improvement assessment of \$144,522 or \$31.08 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same assessment neighborhood 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 described as class 2-09 properties that are improved with two-story dwellings of masonry or frame and masonry exterior construction ranging in size from 5,073 to 5,293 square feet of living area. The dwellings are from 90 to 105 years old. The comparables each have a full or partial basement with finished area, from two to six full bathrooms and from one to four fireplaces. Three comparables each have an additional half bathroom, two comparables have central air conditioning and three comparables each have a 2-car garage. Comparable #3 reportedly has other improvements but the board of review did not provide a description of these improvements. The comparables have improvement assessments ranging from \$169,482 to \$243,749 or from \$32.02 to \$47.20 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 taxpayers contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted nine comparable properties for the Board's consideration. The Board has given less weight to the appellants' comparable #1 which appears to be an outlier due to its considerably lower improvement assessment of \$65,710 or \$14.03 per square foot of living area in comparison to the assessments of the other comparables in the record. The Board has also given less weight to the appellants' comparable #3 due to its lack of a garage, a feature of the subject. The Board has given reduced weight to the four comparables submitted by the board of

review which have a different property classification code and are less similar to the subject dwelling in size. Additionally, board of review comparables #2 and #3 lack central air conditioning and/or a garage, both features of the subject and board of review comparable #3 appears to be an outlier due to its considerably higher improvement assessment of \$243,749 or \$47.20 per square foot of living area in comparison to the assessments of the other comparables in the record.

The Board finds the best evidence of assessment equity to be the appellants' comparables #2, #4 and #5, which have the same assessment neighborhood code and property classification code as the subject. These three comparables are overall more similar to the subject dwelling in size, design and age. However, the comparables are inferior to the subject dwelling in bathroom count and garage capacity, suggesting upward adjustments would be required to make them more equivalent to the subject. Additionally, two comparables were not reported to have basement finish, a feature of the subject and one comparable has a fewer number of fireplaces, suggesting additional upward adjustments for these differences would also be necessary. Nevertheless, the comparables have improvement assessments ranging from \$90,998 to \$143,067 or from \$20.13 to \$29.27 per square foot of living area. The subject's improvement assessment of \$144,522 or \$31.08 per square foot of living area falls above the range established by the best comparables in the record, which appears to be logical given the subject's superior features. After considering adjustments to the best comparables for differences from the subject, the Board finds the appellants did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill.2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which appears to exist on the basis of the evidence presented.

Based on this record, 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: _____

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

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