



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

APPELLANT: Randall Easton, Fr.
DOCKET NO.: 22-24216.001-R-1
PARCEL NO.: 05-28-300-016-0000

The parties of record before the Property Tax Appeal Board are Randall Easton, Fr., the appellant, by Dora Cornelio, attorney-at-law 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: \$21,440
IMPR.: \$66,506
TOTAL: \$87,946

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 two-story dwelling of frame and masonry exterior construction containing 2,709 square feet of living area. The dwelling is approximately 93 years old. Features of the property include a full basement with a formal recreation room, central air conditioning, one fireplace, 1½ bathrooms, and a 2.5-car garage. The property has a 6,700 square foot site located in Wilmette, 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 inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-06 properties improved with two-story dwellings of stucco, frame or masonry exterior construction that range in size from 2,539 to 2,844 square feet of

living area. The homes range in age from 66 to 106 years old. Each property has a full basement with four having finished area, and 1, 2 or 3 fireplaces. The comparables have 1 or 2 full bathrooms and four comparables have an additional 1 or 2 half bathrooms. Three comparables have central air conditioning, and four comparables have a 1-car, 1.5-car or 2-car garage. These properties have the same assessment neighborhood code as the subject property. Their improvement assessments range from \$44,000 to \$56,560 or from \$17.14 to \$19.89 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$53,556.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$87,946. The subject property has an improvement assessment of \$66,506 or \$24.55 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables consisting of class 2-06 properties improved with two-story dwellings of masonry or stucco exterior construction that range in size from 2,628 to 2,719 square feet of living area. The homes range in age from 82 to 99 years old. Each property has a full or partial basement with two having finished area, central air conditioning, 1 or 2 fireplaces, 2½ or 3½ bathrooms and a 2-car garage. The comparables have the same neighborhood code as the subject and are located in the same block, ¼ of a mile from the subject or in the "subarea." Board of review comparable #1 is located along the same street as the subject property. The comparables have improvement assessments ranging from \$69,252 to \$90,560 or from \$25.47 to \$34.46 per square foot of living area. The board of review asserted that the building assessed value per square foot for all the comparables are equal or greater than the subject, which supports the 2022 assessed value as equitable.

Conclusion of Law

The appellant contends 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 appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on nine equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparables #1 and #3 as neither property has central air conditioning and comparable #3 has no garage, which are features of the subject property. The Board gives less weight to appellant's comparable #2 and #5 due to differences from the subject in age. The Board finds the best evidence of assessment equity to be appellant's comparable #4 as well as the board of review comparables. These properties range in size from 2,619 to 2,719 square feet of living area and in age from 82 to 89 years old. The comparables have varying degrees of similarity to the subject in features indicating that adjustments would be appropriate to make them more equivalent to the subject property. Nevertheless, these comparables have improvement assessments that range from \$51,856 to \$90,560 or from \$19.80 to \$34.46 per

square foot of living area. The comparable with the highest improvement assessment is most similar to the subject in location. The subject's improvement assessment of \$66,506 or \$24.55 per square foot of living area falls within the range established by the best comparables in this record and is below the assessment of the comparable most similar to the subject in location. Based on this record the Board finds the appellant did not demonstrate with clear and convincing 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: _____

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: _____

October 21, 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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