



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

APPELLANT: George Capra
DOCKET NO.: 22-24285.001-R-1
PARCEL NO.: 05-33-201-003-0000

The parties of record before the Property Tax Appeal Board are George Capra, the appellant, by attorney Dora Cornelio, 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: \$54,719
IMPR.: \$92,940
TOTAL: \$147,659

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 masonry exterior construction with 3,965 square feet of living area. The dwelling is approximately 96 years old. Features of the home include a basement with finished area, four full and one half bathrooms, central air conditioning, two fireplaces, and a three-car garage. The property has a 19,898 square foot site and is 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 assessment inequity regarding the subject's improvement assessment as the bases of the appeal. In support of this argument, the appellant submitted information on five equity comparables that are located within the same neighborhood code as the subject. The comparables are improved with class 2-06, two-story dwellings of frame, masonry or frame and masonry exterior construction containing from 3,732 to 4,042 square feet of living area. The

dwelling range in age from 97 to 134 years old. According to the property characteristics printouts, the comparables have basements with finished area, two to four full bathrooms and either a two-car or a three-car garage. Two comparables each have one half bathroom, two comparables each have central air conditioning, and four comparables each have a fireplace. The comparables have improvement assessments that range from \$68,250 to \$83,938 or from \$17.35 to \$21.05 per square foot of living area. Based on this evidence, the appellant requested that the subject's improvement assessment be reduced to \$72,995 or \$18.41 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the Cook County Board of Review final decision for the 2022 tax year disclosing the total assessment for the subject of \$147,659. The subject property has an improvement assessment of \$92,940 or \$23.44 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 that are located within the same neighborhood code as the subject. The comparables are improved with two-story dwellings of masonry, stucco or frame and masonry exterior construction containing from 3,449 to 3,982 square feet of living area. The dwellings range in age from 79 to 109 years old. The comparables have basements with three having finished area, 2 to five full and one or two bathrooms, central air conditioning, a fireplace and either a one-car or a two-car garage. The comparables have improvement assessments that range from \$88,500 to \$145,063 or from \$24.84 to \$36.43 per square foot of living area. Based on this evidence, the board of review requested that the assessment be confirmed.

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 a total of nine comparable properties for the Board's consideration. The Board gives less weight to the appellant's comparables #2, #3, #4 and #5 and board of review comparables #1 and #3 which differ considerably from the subject in age and/or lack a basement finish or central air conditioning amenity, which are features of the subject. The Board also gives less weight to the board of review comparable #4 which appears to be an outlier with its significantly higher improvement assessment relative to the other comparables in the record.

The Board finds the best comparables to be the appellant's comparable #1 and board of review comparable #2 which are relatively more similar to the subject in location, age, dwelling size, and basement finish. However, these comparables have a fewer number of bathrooms, a fewer number of fireplaces and/or smaller garage capacity suggesting upward adjustments would be appropriate to make them more equivalent to the subject. These comparables have improvement

assessments of \$68,250 and \$88,500 or \$17.35 and \$25.66 per square foot of living area, respectively. The subject's improvement assessment of \$92,940 or \$23.44 per square foot of living area falls above the two best comparables in the record on an overall basis and is bracketed by them on a per square foot basis, which appears to be logical given the subject's superior features. After considering adjustments to the two best comparables for differences from the subject, 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.

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 the properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity, which exists on the basis of the evidence.

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

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