



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

APPELLANT: Bradley Hulbert
DOCKET NO.: 22-24306.001-R-1
PARCEL NO.: 05-18-308-037-0000

The parties of record before the Property Tax Appeal Board are Bradley Hulbert, 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: \$38,116
IMPR.: \$156,883
TOTAL: \$194,999

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-story dwelling of masonry exterior construction containing 5,396 square feet of living area. The dwelling is approximately 22 years old. Features of the home include a full basement, at least 3 full bathrooms, central air conditioning, two fireplaces and a 3-car garage. The property has a 21,781 square foot site 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 inequity with respect to the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables, four of which are located Winnetka, Illinois and within the same assessment neighborhood code as the subject property. According to the property characteristics printouts, the comparables consist of class 2-09, 2-story or 3-story dwellings of masonry, stucco or frame

and masonry exterior construction ranging in size from 5,108 to 7,464 square feet of living area. The homes are from 23 to 84 years old. Each comparable has a full basement, 3 full and 5 or 2 half bathrooms, 1 or 2 fireplaces and from a 2-car to a 4-car garage. Four comparables each have central air conditioning. The comparables have improvement assessments that range from \$125,848 to \$181,733 or from \$24.35 to \$27.82 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$133,820.

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 \$194,999. The subject property has an improvement assessment of \$156,883 or \$29.07 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables located within Winnetka, Illinois, the same assessment neighborhood code, and the same block as the subject property. The comparables consist of class 2-09, 2-story dwellings of masonry exterior construction ranging in size from 5,335 to 5,651 square feet of living area. The homes are from 19 to 28 years old. Each comparable has a full basement, 3 or 5 full and 2 half bathrooms, central air conditioning, 2 fireplaces and a 3-car garage. The comparables have improvement assessments that range from \$169,247 to \$180,945 or from \$29.95 to \$33.48 per square foot of living area.

In rebuttal, the appellant provided exterior photographs of the subject property and the appellant's comparables which the appellant requested to be added to the appeal because the photographs "were inadvertently not uploaded to the EFP."

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 eight assessment equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2, #3 and #5 along with board of review comparables #2 and #3 due to significant differences in their design, older age, larger dwelling size and/or at least 5 full and 1 or 2 half bathrooms when compared to the subject property. Moreover, the appellant's comparable #2 is located in a different city and assessment neighborhood than the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparable #4 and the board of review comparable #1 which are located within Winnetka and have the same classification and assessment neighborhood codes as the subject. In addition, these comparables are also most similar to the subject in design, age, dwelling size, bathroom count, and/or most

features. These two comparables have improvement assessments of \$140,147 and \$169,247 or \$27.44 and \$29.95 per square foot of living area. The subject's improvement assessment of \$156,883 or \$29.07 per square foot of living area is bracketed by the two best comparables in this record. After considering adjustments to the two best comparables for differences when compared to 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 improvement 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 appears to exist 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: _____

November 25, 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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