



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

APPELLANT: Mani Rad
DOCKET NO.: 22-24320.001-R-1
PARCEL NO.: 05-20-227-006-0000

The parties of record before the Property Tax Appeal Board are Mani Rad, the appellant, by attorney Noah J. Schmidt, 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 **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: \$28,875
IMPR.: \$22,625
TOTAL: \$51,500

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 with 2,140 square feet of living area.¹ The dwelling is 110 years old and has an effective age of 60 years old. Features of the home include a partial basement, central air conditioning, a fireplace, and a 2-car garage. The property has a 10,500 square foot site and is located in Winnetka, 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$515,000

¹ The Board finds the appraisal submitted by the appellant, which includes a detailed property sketch with measurements, to be the best evidence of the subject's dwelling size and features.

as of August 3, 2022. The appraisal was prepared by Garrat Van Wagenen, a certified residential real estate appraiser, for tax appeal purposes.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach by examining three comparable sales located within .69 of a mile of the subject. The comparables are improved with dwellings ranging in size from 1,390 to 2,128 square feet of living area. The dwellings range in age from 69 to 98 years old. Each comparable has a basement and a 1-car or 2-car garage. One comparable has central air conditioning. The parcels range from 8,850 to 10,800 square feet of land area. The sales occurred from August 2021 to March 2022 for prices ranging from \$515,000 to \$575,000 or from \$246.71 to \$413.67 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for location, site size, dwelling size, bathroom count, and other features to arrive at adjusted prices ranging from \$510,000 to \$516,000. Based on this data, the appraiser arrived at a market value of \$515,000 or \$240.65 per square foot of living area, including land, as of August 3, 2022.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$81,000. The subject's assessment reflects a market value of \$810,000 or \$378.50 per square foot of living area, land included, when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted four comparable sales located within the subject's assessment neighborhood, one of which is located .25 of a mile from the subject. The comparables consist of 2-story class 2-06 dwellings of frame or frame and masonry exterior construction ranging in size from 2,620 to 3,396 square feet of living area. The dwellings range in age from 72 to 149 years old. Each dwelling has a basement, one or two fireplaces, and a 1-car, 2-car, or 2.5-car garage. One comparables has central air conditioning. The parcels range in size from 9,350 to 18,700 square feet of land area. The comparables sold from September 2020 to April 2022 for prices ranging from \$975,000 to \$1,290,000 or from \$346.98 to \$379.86 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellant contends 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.

The parties submitted an appraisal and four comparable sales for the Board's consideration. The Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$515,000 or \$240.65 per square foot of living area, including land, as of August 3, 2022. The appraisal was completed using comparable properties similar to the subject, and contained appropriate adjustments to the comparable properties, which further advances the credibility of the report. The subject's

assessment reflects a market value above the appraised value. The Board gave less weight to the comparables presented by the board of review, which differ from the subject in age, dwelling size, and/or sold less proximate to the assessment date at issue. Based on the evidence in this record, the Board finds a reduction in the subject's assessment is 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Mani Rad, by attorney:
Noah J. Schmidt
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602