



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

APPELLANT: Steve Morton
DOCKET NO.: 22-25284.001-R-1
PARCEL NO.: 10-11-202-015-0000

The parties of record before the Property Tax Appeal Board are Steve Morton, the appellant, by attorney Jeremy Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$33,937
IMPR.: \$44,062
TOTAL: \$77,999

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 frame construction with 2,077 square feet of living area that is approximately 110 years old. The dwelling features 2½ baths, a full unfinished basement, central air conditioning, two fireplaces, and a 2-car garage. The property has a 13,575 square foot site and is located in Evanston, Evanston Township, Cook County. The subject is classified as a class 2-05 property¹ under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four equity comparables located from .5 to .7 of a mile from the subject and within the same assessment neighborhood code as the subject property. The comparables are described as “two or more

¹ Two-or-more story residence, over 62 years of age up to 2,200 square feet of living area.

story” class 2-05 dwellings of frame or frame and masonry construction ranging in size from 1,817 to 2,198 square feet of living area and ranging in age from 82 to 96 years old. Each comparable features from 1½ to 2½ baths, central air conditioning, one fireplace, and a 1-car or a 2-car garage. Each comparable also has a full or a partial basement, however it was not disclosed whether the basements have finished area. The comparables have improvement assessments that range from \$36,584 to \$46,093 or from \$17.91 to \$20.97 per square foot of living area. The appellant also submitted a brief requesting a reduction to the subject’s improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$77,999. The subject property has an improvement assessment of \$44,062 or \$21.21 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 located within the same subarea or within ¼ of a mile from the subject and in the same assessment neighborhood code as the subject property. The comparables consist of 2-story, class 2-05 dwellings of frame or masonry construction ranging in size from 2,013 to 2,197 square feet of living area and ranging in age from 93 to 101 years old. The comparables each feature 2 or 2½ baths, a full basement, (two finished with recreation rooms), and a fireplace. Two comparables have central air conditioning, and three comparables have a 2-car garage. The comparables have improvement assessments ranging from \$48,800 to \$54,617 or from \$22.74 to \$26.79 per square foot of living area.

Conclusion of Law

The taxpayer 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 eight equity comparables in support of their positions before the Property Tax Appeal Board. The Board gave reduced weight to appellant’s comparables due to the lack of descriptive information regarding the basement finishes thus making it difficult to conduct a meaningful comparative analysis with the subject dwelling. The Board gave less weight to board of review comparables #3 and #4 based on their finished basement areas, dissimilar to the subject’s unfinished basement. On this record, the Board finds the best evidence of equity in assessment to be board of review comparables #1 and #2 which are overall most similar to the subject in location, bathroom count, age, dwelling size, unfinished basements, garage size, and features. The best comparables in the record have improvement assessments of \$48,800 and \$51,313 or \$22.74 and \$24.97 per square foot of living area. The subject's improvement assessment of \$44,062 or \$21.21 per square foot of living area is lower than the best equity comparables in this record both in terms of overall improvement assessment and on a per square foot of living area basis. After considering adjustments to the best comparables for any differences from the subject, the Board finds that the appellant did not establish by clear and

convincing evidence that the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement assessment is not warranted.

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: _____

June 17, 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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