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

APPELLANT: Wesley Waterston
DOCKET NO.: 22-25906.001-R-1 through 22-25906.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Wesley Waterston, the appellant(s), by attorney Michaela N. Ryan, of the Law Office, Michaela Nolan Ryan 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:

| DOCKET NO | PARCEL NUMBER | LAND | IMPRVMT | TOTAL |
|---|---|---|---|---|
| 22-25906.001-R-1 | 05-17-107-040-0000 | 25,799 | 0 | $25,799 |
| 22-25906.002-R-1 | 05-17-107-052-0000 | 19,034 | 56,167 | $75,201 |

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 two parcels on which stands a two-story dwelling of frame and masonry construction with 3,236 square feet of living area. The dwelling was 89 years old. Features of the home include a partial basement, central air conditioning, two fireplaces and a one-car garage[1]. The property has a 13,586 square foot site and is located in Winnetka, New Trier Township, Cook County. The property is a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity as the basis of the appeal. In support of the argument of overvaluation the appellant submitted an appraisal estimating the subject property had a market value of $1,010,000 as of January 1, 2022. The appraisal was

[1] Based on the inspection by the appraiser, the Board finds that the subject property has 3,236 square feet of living area, two fireplaces, and a one-car garage.

prepared by a certified general real estate appraiser who inspected the property on January 19, 2023, and asserted that the highest and best use of the subject property as improved was its existing use. The appellant disclosed that this is an owner-occupied residence and the appraiser used the sales comparison approach to valuation.

Under the sales comparison approach, the appraiser utilized three comparable sales properties located within a 0.59-mile radius of the subject. The comparable properties sites ranged in size from 8,050 to 17,975 square feet of land area and from 2,524 to 3,388 square feet of living area. The properties are each improved with a two-story single-family dwelling of brick or brick and stucco exterior construction that were from 81 to 96 years old. The comparable properties sold from January 2021 to June 2021 for prices ranging from $811,250 to $1,165,000 or from $321.41 to $351.35 per square foot of living area, land included in the sales prices. The appraiser adjusted, if applicable, for site, room count, gross living area, deck, garage, fireplace, basement/finish, rooms below grade, condition, and kitchen/bath updates. The appraiser concluded that based on the sales data and applying adjustments to the comparable sales for differences from the subject, the subject, including both parcels of land and the improvement, had a market value of $1,010,000. Based on this evidence the appellant is seeking a reduction in the improvement on the subject property to reflect the appraisal.

In support of the argument of assessment inequity the appellant submitted information on three equity comparable properties with varying degrees of similarity to the subject which are located within a 0.2-mile radius of the subject. The improvements ranged: in age from 93 to 109 years; in size from 3,240 to 3,892 square feet of living area; and in improvement assessment from $18.52 to $18.80 per square foot of living area. Based on this evidence the appellant is seeking a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the assessment of $94,118 for PIN -052, which is under appeal. The assessment for PIN -040 is $25,799 for a total assessment for the subject of $119,917. The subject's assessment reflects a market value of $1,199,170 or $370.57 per square foot of living area, including land, when applying the level of assessments for class two property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales properties which sold from October 2020 to May 2021 for sales prices from $1,100,000, to $1,355,000 or from $343.32 to $443.25 per square foot of living area, land included in the sales prices. These properties were located in the same subarea as the subject including one within a ¼-mile of the subject. The improvements were from 97 to 105 years old and had from 2,936 to 3,204 square feet of living area.

The board of review used the same four properties in support of its argument of correct assessment based on equity and asserted that the improvement assessments for the properties were from $26.49 to $36.48 per square foot living area. Based on this evidence the board of review requested confirmation of the subject's assessment.

## Conclusion of Law

The appellant contends, in part, that 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 Board finds the best evidence of market value to be the appraisal submitted by the appellant. The Board finds the appellant submitted a credible appraisal report with reasonable and logical adjustments for differences from the subject. The comparable sales properties presented by the board of review lacked adjustments for significant differences when compared to the subject property. The subject's current assessment reflects a market value of $1,199,170, which is higher than the appraised value of $1,010,000. Based on the evidence presented, the Board finds the subject property is overvalued and a reduction commensurate with the appellant's request, for the assessment allocated to the improvement on the subject property, is warranted. Since market value has been established the level of assessment for class two property under the Cook County Real Property Assessment Classification Ordinance shall apply. (86 Ill.Admin.Code §1910.50(c)(2)). After this reduction the Board finds that the subject property is equitably assessed.

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:

C E R T I F I C A T I O N

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: September 15, 2026

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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