



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

APPELLANT: Sheila Nielsen
DOCKET NO.: 22-26493.001-R-1
PARCEL NO.: 05-17-313-007-0000

The parties of record before the Property Tax Appeal Board are Sheila Nielsen, the appellant, by attorney Nicholas T. McIntyre, of Much Shelist, P.C. 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: \$57,596
IMPR.: \$154,904
TOTAL: \$212,500

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 “Georgian”-style dwelling with 7,028 square feet of living area of masonry construction including a Coach house. The dwelling was constructed in 1924 and is approximately 98 years old. Features of the home include 3 full and 2 half-baths, a full basement finished with a recreation room, central air conditioning, 3 fireplaces, and a 3-car garage.¹ The property has a 41,140 square foot site and is located in Winnetka, New Trier Township, Cook County. The subject is classified as a class 2-09 property² 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 prepared by David Conaghan, CIAO, Certified General Real

¹ The parties disagree with some descriptive characteristics of the subject dwelling. The Board will adopt the appraisers’ description who personally inspected the subject dwelling and took measurements.

² Two-or-more story residence, any age, with 5,000 square feet or more living area.

Estate Appraiser, and Tom J. Boyle, Jr., Associate Real Estate Trainee Appraiser. The appraisal was prepared for the purpose of estimating market value of the subject property for equitable ad valorem tax assessment purposes. The property rights appraised were fee simple interest in the real estate. The appraisers utilized the sales comparison approach to value in arriving at an estimated market value for the subject property of \$2,125,000 as of January 1, 2022.

Using the sales comparison approach, the appraisers analyzed five sales which were located from .27 to .74 of a mile from the subject property. The comparable parcels range in size from 9,989 to 54,598 square feet of land area and are improved with "Traditional," "Prairie," or "Georgian" style dwellings ranging in size from 5,980 to 6,120 square feet of living area and ranging in age from 23 to 114 years old. Each dwelling was described as having from 3 to 5 full baths with each having either 1 or 4 half-baths. Each dwelling also features a full or partial basement (four of which have finished areas), central air conditioning, 2 to 5 fireplaces, and 2-car or a 3-car garage. The comparables sold from March 2019 to November 2020 for prices ranging from \$1,800,000 to \$2,150,000 or from \$294.12 to \$353.33 per square foot of living area, including land. The appraisers noted that "[t]here are no known sales of the comparable properties for one year prior to the effective date of the appraisal." Furthermore, the appraisers asserted that "[b]ased on our MLS search, the sales comparables used were considered the most recent, most similar and proximate to subject."

The appraisers made dollar adjustments to the comparables for differences from the subject for sale/financing concessions, site size, quality of construction, age, room count, dwelling size, HVAC, porch/patio/pool amenities, garage size, kitchen/bath finishes, and fireplace count. The appraisers explained the methodology utilized for adjustments and noted that the adjustments have been quantified and are based upon the appraisers' professional judgment when data was insufficient to enable market extraction. The appraisers arrived at adjusted sale prices ranging from \$2,001,800 to \$2,309,300 and concluded an opinion of value for the subject property of \$2,125,000 or \$302.36 per square foot of living area, land included, as of January 1, 2022.

Based on the foregoing appraisal report, the appellant requested a reduced assessment reflective of the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$233,544. The subject's assessment reflects a market value of \$2,335,440 or \$332.31 per square foot of living area, including land, when using the dwelling size of 7,028 square feet and 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 a grid analysis with information on four comparable properties, only one of which contained sales data.³ Comparable #2 is located within the same (survey) block as the subject, and within the same assessment neighborhood code as the subject property. The comparable has a 46,261 square feet of land area and is improved with a 2-story, class 2-09 dwelling containing 6,467

³ As only board of review comparable #2 contains sale data and is the only evidence responsive to the appellant's market value appeal, the Board will not consider or analyze the remaining comparables submitted by the board of review as they do not address the taxpayer's basis of the appeal.

square feet of living area and is 94 years old. The dwelling features 7 full and 2 half-baths, a partial basement finished with a recreation room, central air conditioning, 4 fireplaces, and a 2.5-car garage. The comparable sold in August 2021 for a price of \$4,188,520 or \$647.68 per square foot of living area, including land.

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 appellant submitted an appraisal report containing five comparable sales, and the board of review submitted one comparable sale in support of their respective positions before the Property Tax Appeal Board. The Board finds the best evidence of market value to be the opinion of value reached in the appraisal submitted by the appellant. The board of review neither objected to the appellant's appraisal nor disputed or critiqued any information contained therein. The appraisers' five comparable sales have been adjusted for many differences from the subject in sale/financing concessions, site size, quality of construction, age, room count, dwelling size, HVAC, porch/patio/pool amenities, garage size, kitchen/bath finishes, and fireplace count. The Board finds these adjustments appear to be logical and reasonable. The appraiser concluded an opinion of value for the subject property of \$2,125,000 or \$302.36 per square foot of living area, land included, as of January 1, 2022.

Although three of the five comparable sales utilized by the appraisers occurred in 2019 which is not proximate in time to the assessment date at issue, the appraisers explained that "[t]here are no known sales of the comparable properties for one year prior to the effective date of the appraisal," i.e. January 1, 2022. The board of review presented only one sale that occurred before January 1, 2022. The Board gave less weight to the single unadjusted raw sale submitted by the board of review based on this property appearing to be an outlier given its significantly higher sale price relative to the remaining five comparable sales in the record and without further explanation as to the reason for the higher sale price or other market value evidence to support the subject's assessment. The subject's assessment reflects an estimated market value of \$2,335,440 or \$332.31 per square foot of living area, land included, which is higher than the \$2,125,000 opinion of value arrived at by the appraisers. Therefore, based on this record, the Board finds the subject's estimated market value as reflected by its assessment is overvalued and a reduction in the subject's assessment commensurate with appellant's request 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: _____

August 19, 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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