



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

APPELLANT: Janice Winer
DOCKET NO.: 22-27063.001-R-1
PARCEL NO.: 05-31-421-011-0000

The parties of record before the Property Tax Appeal Board are Janice Winer, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; 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: \$21,840
IMPR.: \$33,060
TOTAL: \$54,900

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 is improved with a 1-story dwelling of frame exterior construction containing 2,709 square feet of living area and is approximately 68 years old. The home has a concrete slab foundation¹ and features 3 full baths, central air conditioning, 2 fireplaces, and a 2-car garage. The property has a 13,650 square foot site and is located in Wilmette, New Trier Township, Cook County. The subject is classified as a class 2-04 property² under the Cook County Real Property Assessment Classification Ordinance.

The appellant's claim is based on overvaluation and inequity in assessment with respect to the improvement assessment. In support of the overvaluation argument, the appellant submitted evidence disclosing the subject property was purchased in December 2020 for a price of

¹ The parties disagree on the subject's foundation. The Board will adopt the appellant's description that the subject has a concrete slab foundation which is reiterated in the MLS listing sheet.

² One-story residence, any age, 1,801 square feet and more of living area.

\$549,000 from Shabam Ratkoceri. The appellant completed Section IV - Recent Sale Data of the appeal petition disclosing the parties to the transaction were not related, the property was sold by a realtor, and the property was advertised for sale through the Multiple Listing Service (MLS) for 1.5 months. To document the sale, the appellant submitted a copy of the Settlement Statement associated with the sale of subject which disclosed real estate commission was paid to two entities. To further document the sale, the appellant submitted a copy of the MLS listing sheet associated with the subject's sale, a copy of the contract for purchase and sale, and a copy of the Illinois Real Estate Transfer Declaration (PTAX-203) form reiterating the transaction between the said parties, the purchase price, and that the subject property was advertised for sale.

In support of the assessment inequity argument, the appellant submitted a grid analysis containing information on three equity comparables. Based on this evidence, the appellant requested a reduction to the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$58,000. The subject's assessment reflects a market value of \$580,000 or \$214.10 per square foot of living area, including land, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted information on four comparable properties containing both sales and assessment equity data. The properties are located within the same subarea or the same survey block as the subject and within the same neighborhood code as the subject property. The comparables have sites that range in size from 9,310 to 25,434 square feet of land area and are improved with 1-story, 1.5-story, or 2-story class 2-04 dwellings of frame or frame and masonry exterior construction that range in size from 2,443 to 3,118 square feet of living area and range in age from 26 to 64 years old. The comparables have either 2½ or 3 bathrooms and a 1-car or a 2-car garage. Three dwellings have partial unfinished basements, and one home has a concrete slab foundation. Three dwellings have central air conditioning and one fireplace. The sales occurred from April 2019 to April 2022 for prices ranging from \$691,500 to \$815,000 or from \$221.78 to \$319.28 per square foot of living area, including land. The comparables have improvement assessments ranging from \$32,223 to \$54,600 or from \$10.33 to \$22.35 per square foot of living area. In addition, the board of review's grid analysis reported the subject sold for \$549,000 in January 2021. 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.

As to the overvaluation issue, the record contains evidence submitted by the appellant consisting of the sale of the subject property, along with four comparable sales submitted by the board of

review to establish the subject's market value. The Illinois Supreme Court has defined fair cash or market value as what the property would bring at a voluntary sale where the owner is ready, willing, and able to sell but not compelled to do so, and the buyer is ready, willing and able to buy but not forced to do so. Springfield Marine Bank v. Property Tax Appeal Board, 44 Ill.2d. 428, (1970). The Illinois Supreme Court has held that a contemporaneous sale between two parties dealing at arm's length is not only relevant to the question of fair cash value, but practically conclusive on the issue on whether the assessment is reflective of market value. Korzen v. Belt Railway Co. of Chicago, 37 Ill.2d 158 (1967).

The appellant provided evidence demonstrating the sale had the elements of an arm's-length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the subject property was purchased in December 2020 for a price of \$549,000; the parties to the transaction were not related; the property was sold by a realtor; and the property was advertised for sale through the Multiple Listing Service (MLS) for 1.5 months. To document the sale, the appellant submitted a copy of the Settlement Statement associated with the sale of subject which disclosed real estate commission was paid to two entities. Additionally, the appellant submitted a copy of the MLS listing sheet, the contract for purchase and sale, and the Illinois Real Estate Transfer Declaration (PTAX-203) form reiterating the transaction between the said parties, the purchase price, and that the subject property was advertised for sale. The board of review did not present any evidence to challenge the arm's-length nature of the transaction and acknowledged the subject's sale in the grid analysis.

As to the board of review evidence, comparable sales #2, #3, and #4 have basements, dissimilar to the subject's concrete slab foundation. Additionally, board of review comparable #1 is a 2-story home, dissimilar to the subject's 1-story design. Lastly, board of review comparable sale #2 occurred in 2019 which is not proximate in time to the January 1, 2022 assessment date at issue and therefore less likely to be reflective of the subject's market value as of the lien date. Notwithstanding these differences from the subject, the most recent board of review sales do not overcome the arm's-length sale of the subject property. The subject's assessment reflects a market value of \$580,000 or \$214.10 per square foot of living area, including land, which is higher than the subject's sale price of \$549,000 or \$202.66 per square foot of living area, land included. Therefore, based on the evidence in this record, the Board finds that the appellant has demonstrated by the preponderance of the evidence that the subject property is overvalued and, thus, a reduction in the subject's assessment to reflect the subject's sale is warranted.

As to the appellant's assessment inequity argument with regard to the improvement, after considering the assessment reduction granted to the subject property based on market value consideration, the Board finds the subject property is equitably assessed. Therefore, no further reduction in the subject's assessment is warranted based on the principles of uniformity.

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: _____

September 16, 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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