

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Christopher Crosby DOCKET NO.: 22-27419.001-R-1 PARCEL NO.: 05-28-216-027-0000

The parties of record before the Property Tax Appeal Board are Christopher Crosby, the appellant, by attorney George N. Reveliotis of Reveliotis Law, P.C. in Park Ridge; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds <u>no change</u> 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:** \$31,337 **IMPR.:** \$70,972 **TOTAL:** \$102,309

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 two-story dwelling of frame and masonry exterior construction with 3,149 square feet of living area. The dwelling is approximately 68 years old. Features of the dwelling include a full basement that is finished with a formal recreation room, two full bathrooms, two half bathrooms, central air conditioning, two fireplaces and a two-car garage. The property has a 9,793 square foot site and is located in Kenilworth, 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 information on four comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located within .8 of a mile from the subject property and have sites that range in size from 6,100 to 8,750

square feet of land area. The comparables are improved with two-story dwellings of frame and masonry exterior construction ranging in size from 2,932 to 3,100 square feet of living area. The dwellings are from 74 to 96 years old. The comparables each have a full or partial basement, one of which has finished area. Each comparable has two or three full bathrooms and one fireplace. Two comparables each have an additional half bathroom, two comparables have central air conditioning and three comparables each have either a one-car or a two-car garage. The properties sold from July 2019 to April 2021 for prices ranging from \$870,000 to \$912,000 or from \$293.62 to \$298.43 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$93,058, reflecting a market value of \$930,580 or \$295.52 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal." The appellant provided a copy of the Cook County Board of Review decision for the 2022 tax year disclosing the total assessment for the subject of \$102,309. The subject's assessment reflects a market value of \$1,023,090 or \$324.89 per square foot of living area, including land, when applying the level of assessment for class 2 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 properties that have the same assessment neighborhood code and property classification code as the subject. The comparables are located within the subject's subarea and have sites that range in size from 6,500 to 12,375 square feet of land area. The comparables are improved with two-story dwellings of frame, masonry or frame and masonry exterior construction ranging in size from 2,982 to 3,141 square feet of living area. The dwellings are from 68 to 84 years old. The comparables each have a full or partial basement, two of which are finished with a formal recreation room. Each comparable has two or three full bathrooms, one additional half bathroom and central air conditioning. Three comparables each have one or two fireplaces and three comparables each have either a one-car or a two-car garage. The properties sold from May 2020 to August 2022 for prices ranging from \$1,130,000 to \$1,300,000 or from \$359.76 to \$432.04 per square foot of living area, land included. 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains eight comparable sales for the Board's consideration. The Board has given less weight to the appellant's four comparables, as well as board of review comparables #3 and #4, due to their considerably older dwelling ages and/or they have sale dates that occurred in

2019 or 2020, less proximate in time to the lien date at issue than other comparable sales in the record.

The Board finds the best evidence of market value to be board of review comparables #1 and #2, which sold proximate in time to the assessment date at issue. These two comparables are similar to the subject in location, dwelling size, design, age and some features. The comparables sold in March and July 2021 for prices of \$1,275,000 and \$1,300,000 or for \$427.57 and \$432.04 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,023,090 or \$324.89 per square foot of living area, including land, which is less than the two best comparable sales in record both in terms of overall market value and on a price per square foot of living area basis. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not warranted based on overvaluation.

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.

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	Chairman
C. R.	Robert Stoffen
Member	Member
Dan De Kinin	Sarah Bokley
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
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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 <u>PETITION AND EVIDENCE</u> 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**

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# **COUNTY**

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