



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

APPELLANT: Michele Figueroa
DOCKET NO.: 22-27465.001-R-1
PARCEL NO.: 05-07-114-022-0000

The parties of record before the Property Tax Appeal Board are Michele Figueroa, the appellant, by attorney Herbert B. Rosenberg of Rock Fusco & Connelly, LLC 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: \$25,410
IMPR.: \$36,590
TOTAL: \$62,000

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 exterior construction with 2,253 square feet of living area. The dwelling was constructed in 1901 and is approximately 121 years old. Features include a full basement with finished area, two full bathrooms, one half bathroom central air conditioning and a detached two-car garage.¹ The property has an 11,550 square foot site and is located in Glencoe, 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 an appraisal estimating the subject property had a market value of \$575,000 as of January 1, 2022. The appraisal was prepared by Robert S. Kang, a Certified General Real

¹ The Board finds the best description of the subject's bathroom count is found in the appraisal submitted by the appellant, which was not refuted by the board of review.

Estate Appraiser. The intended use of the appraisal report was to provide an opinion of market value for the subject property in order to establish an equitable ad valorem tax assessment and no other purposes.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting six comparable sales located proximate to the subject property in Glencoe. The comparables have sites that range in size from 7,000 to 13,142 square feet of land area. The comparables are improved with dwellings that have varying story heights and are of masonry or masonry and frame exterior construction ranging in size from 2,487 to 3,462 square feet of living area. The dwellings were built from 1921 to 1956. The comparables each have a basement, three of which have finished area. Each comparable has from two to four full bathrooms, one half bathroom and from a one-car to a three-car garage. The comparables sold from March 2020 to March 2022 for prices ranging from \$364,000 to \$675,000 or from \$146.36 to \$258.03 per square foot of living area.

The appraiser made quantitative adjustments to the comparables for differences from the subject in dwelling size, garage parking, basement finish, lot size and age/condition arriving at adjusted sale prices per square foot for the comparables ranging from \$161.00 to \$265.77. The appraiser opined a per square foot market value for the subject of \$255.00 resulting in an indicated value for the subject of \$575,000. Based on this evidence, the appellant requested the subject's assessment be reduced to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$84,123. The subject's assessment reflects a market value of \$841,230 or \$373.38 per square foot of building 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 comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables are located within the same block or approximately ¼ of a mile from the subject property. The comparables have sites that range in size from 2,958 to 3,849 square feet of land area and are improved with two-story dwellings of frame or frame and masonry exterior construction ranging in size from 2,958 to 3,849 square feet of living area. The dwellings range in age from 87 to 132 years old. The comparables each have a full or partial basement, two of which have finished area. Each comparable has two full bathrooms, one or two half bathrooms, one or two fireplaces and either a one-car or a two-car garage. Two comparables each have central air conditioning. The comparables sold from May to October 2022 for prices ranging from \$1,277,000 to \$1,500,000 or from \$389.71 to \$435.14 per square foot of living area, land included. Based on this evidence, the board of review requests the subject's assessment be confirmed.

In rebuttal, counsel for the appellant argued that the board of review comparables sold subsequent to the January 1, 2022 valuation date, in comparison to six of the seven sales in the taxpayer's appraisal which occurred in the two years leading up to January 1, 2022. Counsel argued that none of the comparable sales submitted by the board of review were adjusted for differences in characteristics from the subject property. The appellant's counsel further argued

that the appellant's evidence should be accepted as the best evidence of value as of January 1, 2022.

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 a reduction in the subject's assessment is warranted based upon the evidence in the record.

The appellant submitted an appraisal and the board of review submitted four comparable sales in support of their respective positions before the Board. The Board has given less weight to the appraised value conclusion as the appraiser selected comparables #2, #5, #6 and #7 which are from 29% to 54% larger in dwelling size, when compared to the subject. Moreover, the appraiser did not adjust comparable #2 for size difference, although the dwelling is 29% larger than the subject. For these reasons the Board finds the appraisal states a less credible and/or reliable opinion of value and the Board will instead consider the raw sales data presented in the appraisal and by the board of review.

The record contains a total of ten comparable sales for the Board's consideration. The Board has given less weight to the appraisal comparables #2, #5, #6 and #7 and the four comparables submitted by the board of review, which are from 29% to 71% larger in dwelling size, when compared to the subject. The Board has also given less weight to appraisal comparable #1, which appears to be an outlier due to its considerably lower sale price of \$364,000 or \$146.36 per square foot of living area, including land in relation to the other sales in the record.

The Board finds the best evidence of market value to be the appraisal sales #3 and #4, which are most similar to the subject in dwelling size and some features, although comparable #3 sold 16 months prior to the assessment date at issue. These two comparables sold for prices of \$565,000 and \$675,000 or for \$216.97 and \$258.03 per square foot of living area, including land. The subject's assessment reflects a market value of \$841,230 or \$373.38 per square foot of living area, including land, which is greater than the two best comparables in the record both in terms of overall market value and on a price per square foot of living area basis. After considering adjustments to the best comparables for differences from the subject, the Board finds the subject's estimated market value as reflected by its assessment is excessive. Therefore, based on this record the Board finds a reduction in the subject's assessment is 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: _____

October 21, 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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