



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

APPELLANT: Jay Shefsky
DOCKET NO.: 22-29468.001-R-1
PARCEL NO.: 11-19-310-007-0000

The parties of record before the Property Tax Appeal Board are Jay Shefsky, the appellant, by attorney Max E. Callahan, of Siegel & Callahan, 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 **No Change** 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: \$17,600
IMPR.: \$55,400
TOTAL: \$73,000

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 2-story dwelling of frame exterior construction with 2,204 square feet of living area. The dwelling is approximately 124 years old. Features of the home include a basement with finished area, a fireplace, and a 2-car garage.¹ The property has a 6,400 square foot site and is located in Evanston, Evanston 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 \$585,000

¹ The Board finds the best evidence of the subject's features is found in the appellant's appraisal where the appraiser inspected the subject home on February 16, 2023.

as of January 1, 2022. The appraisal was prepared by Gregory Nold, a certified general real estate appraiser, for ad valorem tax purposes.

Under the sales comparison approach, the appraiser selected six comparable sales located within 0.39 of a mile from the subject. The parcels range in size from 5,250 to 7,050 square feet of land area and are improved with 1.5-story or 2-story homes of frame or frame and masonry/brick exterior construction ranging in size from 1,929 to 2,313 square feet of living area. The dwellings range in age from 70 to 128 years old. Five homes have a basement, two of which have finished area. Each home has a central air conditioning, one or two fireplaces, and a 2-car garage. The comparables sold from September 2020 to March 2022 for prices ranging from \$455,000 to \$599,000 or from \$235.87 to \$286.55 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject to arrive at adjusted prices ranging from \$542,000 to \$595,300. The appraiser concluded a value for the subject of \$585,000 as of January 1, 2022.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$73,000. The subject's assessment reflects a market value of \$730,000 or \$331.22 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 three comparable sales located 0.25 of a mile from the subject. The parcels range in size from 3,720 to 6,160 square feet of land area and are improved with 2-story, class 2-06 homes of frame exterior construction ranging in size from 1,815 to 2,072 square feet of living area. The dwellings range in age from 107 to 129 years old. Each home has a basement, two homes have central air conditioning, and two comparables have a 2.5-car garage. The comparables sold from December 2020 to September 2021 for prices ranging from \$567,500 to \$850,000 or from \$312.67 to \$428.13 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellant argued the appraisal was the best evidence of the subject's market value compared to the board of review's unadjusted sales.

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 appellant presented an appraisal and the board of review presented three comparable sales in support of their respective positions before the Board. The Board gives less weight to the appraised value conclusion as the appraiser selected four of six comparable sales that occurred in 2020, less proximate in time to the January 1, 2022 assessment date, when more recent sales were available as demonstrated by the board of review's comparables. Four appraisal sales are substantially newer homes than the subject but no adjustments for age were made. 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 presented in the appraisal and by the board of review.

The record contains a total of nine comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #2 through #6 and the board of review's comparable #1, due to substantial differences from the subject in age and/or foundation type. Moreover, the appraisal sales #5 and #6 sold less proximate in time to the assessment date than the other sales in this record.

The Board finds the best evidence of market value to be the appraisal sale #1 and the board of review's comparables #2 and #3, which sold more proximate in time to the assessment date and are more similar to the subject in design, dwelling size, age, location, and some features, although these comparables lack finished basement area and one comparable lacks central air conditioning that are features of the subject and one comparable has a much smaller site than the subject, suggesting upward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables sold for prices ranging from \$599,000 to \$850,000 or from \$258.97 to \$428.13 per square foot of living area, including land. The subject's assessment reflects a market value of \$730,000 or \$331.22 per square foot of living area, including land, which is within the range established by the best comparable sales in the record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not 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

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: July 15, 2025

Clerk of the Property Tax Appeal Board

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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