



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

APPELLANT: Leonard Gambino
DOCKET NO.: 22-30756.001-R-1
PARCEL NO.: 08-12-224-005-0000

The parties of record before the Property Tax Appeal Board are Leonard Gambino, 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 **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: \$7,600
IMPR.: \$48,017
TOTAL: \$55,617

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 traditional-style dwelling of frame and masonry exterior construction with 2,964 square feet of living area. The dwelling is approximately 85 years old. Features of the home include a basement with finished area,¹ central air conditioning, a fireplace, and a 1-car garage. The property has an 8,000 square foot site and is located in Mount Prospect, Elk Grove 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 \$455,000

¹ The parties differ regarding the subject's basement finish. The Board finds the best evidence of basement finish is found in the appellant's appraisal which includes photographs of the subject's finished basement area.

as of January 1, 2022. The appraisal was prepared by Lilie Toshev, a certified residential real estate appraiser, to determine market value as of January 1, 2022.

Under the sales comparison approach, the appraiser selected five comparable sales located within 0.91 of a mile from the subject. The parcels range in size from 8,000 to 10,010 square feet of land area and are improved with traditional, colonial, or bungalow style homes of frame, brick, cedar, or brick and frame exterior construction. The homes range in size from 1,885 to 2,970 square feet of living area and range in age from 34 to 92 years old. Each home has a basement, three of which have finished area, central air conditioning, and a 1-car or a 2-car garage. The comparables sold from July 2019 to June 2021 for prices ranging from \$369,000 to \$464,000 or from \$156.23 to \$217.03 per square foot of living area, including land. The appraiser adjusted one comparable for financing concessions and then adjusted the comparables for differences from the subject, such as site size, condition, room count, dwelling size, basement size and finish, and garage size, to arrive at adjusted prices ranging from \$436,640 to \$475,480. The appraiser concluded a value for the subject of \$455,000 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 \$55,616. The subject's assessment reflects a market value of \$556,160 or \$187.64 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 comparables have 8,300 or 15,383 square foot sites that are improved with 2-story, class 2-06 homes of frame or masonry exterior construction ranging in size from 2,602 to 3,058 square feet of living area. The dwellings range in age from 79 to 149 years old, with the oldest home described as renovated. Each home has a basement, two of which have finished area, central air conditioning, and a 1-car or a 1.5-car garage. Two homes have one or two fireplaces. Comparable #2 has other improvements that were not identified. The comparables sold from August 2021 to August 2022 for prices ranging from \$555,000 to \$850,000 or from \$213.30 to \$277.06 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 appellant's appraisal should be given more weight than the unadjusted raw sales presented by the board of review. The appellant contended the board of review's comparable #1 has superior features compared to the subject, such as a 2-car tandem garage, updates, and a whole house generator. For the board of review's comparable #2, the appellant argued the board of review did not describe the other improvements it indicated this property has. The appellant asserted the board of review's comparable #3 has two fireplaces and a 2-car garage that were not disclosed by the board of review and also has additional features such as walk-in pantry and updates. The appellant submitted unidentified descriptive printouts for the board of review's comparables #1 and #3.

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 submitted an appraisal and the board of review submitted 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 three sales that occurred in 2019 and 2020, and three sales located almost one mile from the subject. Moreover, the appraiser made no adjustments for age to the two 34-year-old comparables compared to the subject's 85-year-old home. For these reasons, the Board finds the appraisal states a less reliable and/or credible 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 eight comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #2, #4, and #5, which sold less proximate in time to the assessment date and are located more distant from the subject than the other sales in this record. The Board also gives less weight to the board of review's comparable #2, which has other improvements that were not identified, and the board of review's comparable #3, which sold for considerably more than the other sales in this record, suggesting this sale may be an outlier.

The Board finds the best evidence of market value to be the appraisal sales #1 and #3 and the board of review's comparable #1, which sold more proximate in time to the assessment date and are more similar to the subject in location, site size, and features. These comparables are smaller homes than the subject and two comparables lack basement finish that is a feature of the subject, suggesting upward adjustments to these comparables would be needed for these features to make them more equivalent to the subject. However, one comparable has a larger garage than the subject as disclosed by the appellant and one comparable is a significantly newer home than the subject, suggesting downward adjustments for these features would be needed.

These comparables sold for prices ranging from \$369,000 to \$589,000 or from \$163.75 to \$220.35 per square foot of living area, including land. The subject's assessment reflects a market value of \$556,160 or \$187.64 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence and after considering appropriate adjustments to the best comparables for differences from the subject, including their smaller dwelling sizes compared to 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

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: _____

June 17, 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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