



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

APPELLANT: David Thomsen
DOCKET NO.: 22-32271.001-R-1
PARCEL NO.: 02-26-106-040-0000

The parties of record before the Property Tax Appeal Board are David Thomsen, the appellant, by Dora Cornelio, attorney-at-law of Schmidt Salzman & Moran, Ltd. 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: \$15,592
IMPR.: \$46,407
TOTAL: \$61,999

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 two-story dwelling of masonry exterior construction containing 4,009 square feet of living area. The dwelling is approximately 28 years old. Features of the property include a full basement, central air conditioning, one fireplace, 2½ bathrooms, and a 2-car garage. The property has a 22,275 square foot site located in Palatine, Palatine Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-08 properties improved with two-story dwellings of frame or frame and masonry exterior construction that range in size from 3,853 to 4,356 square feet of living area. The homes range in age from 22 to 59 years old. Each property has a full basement

with four having finished area, central air conditioning, one fireplace, two to four bathrooms, and a 2-car or 3-car garage. The comparables have the same assessment neighborhood code as the subject property but the appellant did not know the proximity of the comparables to the subject property. These properties have improvement assessments ranging from \$33,000 to \$46,683 or from \$8.20 to \$10.72 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$35,519.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$61,999. The subject property has an improvement assessment of \$46,407 or \$11.58 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on twelve equity comparables consisting of class 2-08 properties improved with two-story dwellings of frame, masonry or frame and masonry exterior construction that range in size from 3,849 to 4,961 square feet of living area.¹ The homes range in age from 5 to 22 years old. Each comparable has a full or partial basement with three having finished area, central air conditioning, one or two fireplaces, and a 2-car, 3-car or 3.5-car garage. The comparables have 3, 3½, 4 or 4½ bathrooms. These properties have the same assessment neighborhood code as the subject and are located ¼ of a mile from the subject. These properties have improvement assessments ranging from \$50,383 to \$67,109 or from \$12.02 to \$16.80 per square foot of living area.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on 17 equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparable #1 due to differences from the subject in age and location. Although the appellant's comparables #2, #3, #4 and #5 are similar to the subject in age and dwelling size, the appellant did not provide information as to the proximity of these comparables to the subject property. A comparison of the subject's property index number and the appellant's comparables' property index numbers indicate the comparables are not similar to the subject in location which detracts from the weight that can be given these properties. The Board gives less weight to Board of review comparables #1, #2, #3, #6, #9, #10, #11 and #12 due to differences from the subject dwelling in age and/or size. The Board finds the best evidence of assessment equity to be board of review comparables #3, #5, #7 and #8 that range in size from 3,849 to 4,230 square feet of living area and are 20 or 22 years old. Each of these comparables have an additional ½ bathroom and a larger garage than the subject indicating each property

¹ The Board renumbered the board of review comparables consecutively from #1 through #12 for ease of understanding.

would require a downward adjustment to make it more equivalent to the subject property for these differences. These four comparables have improvement assessments that range from \$50,383 to \$58,676 or from \$13.09 to \$14.61 per square foot of living area. The subject's improvement assessment of \$46,407 or \$11.58 per square foot of living area falls below the range established by the best comparables in this record. Based on this record, after considering the appropriate adjustments to the best comparables to make them more equivalent to the subject property, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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: _____

January 20, 2026



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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