



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

APPELLANT: Sheila Stein
DOCKET NO.: 22-42986.001-R-1
PARCEL NO.: 10-14-322-024-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Sheila Stein, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, PTAB hereby finds **No Change** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

LAND: \$12,574
IMPR.: \$36,425
TOTAL: \$48,999

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a Cook County Board of Review decision pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) contesting 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 1,938 square feet two-story dwelling of frame and masonry construction built on an 8,672 square feet parcel in Skokie, Niles Township, Cook County. The 62-year-old home, a class 2-07 property per the Cook County Real Property Assessment Classification Ordinance, includes 1.5 bathrooms, central air conditioning, and a partial basement.

Challenging the \$36,425 improvement assessment for the subject as inequitably high, the appellant requests the Property Tax Appeal Board (PTAB) decrease the assessment to \$16.98 per improvement square foot instead. To demonstrate assessment inequity, the appellant supplied information on four class 2-07 properties within 2.7 miles of the subject as assessment benchmarks. The appellant's suggested comparables all featured air conditioning, a partial basement, and at least 1.5 bathrooms. The selected properties varied from 57 to 61 years in

building age; 1,876 to 1,982 square feet in living space; no to a 1.5-car garage; and \$16.46 to \$18.01 per living square foot in improvement assessment.

In its “Board of Review Notes on Appeal,” the county board of review responded that the subject improvement was correctly assessed at \$18.80 per square foot.¹ As support for this contention, the board of review placed into evidence four frame and masonry properties within a quarter mile of the subject as comparators for assessment equity. The board of review’s selections featured a one- or two-car garage, either one fireplace or none, and at least 1.5 bathrooms. These comparables ranged in building age from 63 to 74 years old; in improvement size from 1,919 to 2,184 square feet; and in assessment from \$18.85 to \$19.66 per improvement square foot.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. The Illinois Constitution requires real estate taxes “be levied uniformly by valuation ascertained as the General Assembly shall provide by law.” Ill. Const., art. IX, § 4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). Yet this uniformity provision of the Illinois Constitution does not require absolute equality in taxation; instead, a reasonable degree of uniformity in the taxing authority’s assessments suffices. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When unequal treatment in the assessment is the basis of a property tax appeal, the appellant must prove the inequity of the assessments by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof needed for a criminal conviction. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995). Proof of unequal treatment in the assessment process should comprise assessment documentation for the year in question of at least 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 Property Tax Appeal Board (PTAB) finds the appellant did not meet this burden of proof.

In this record, appellant comparable #2 and board of review comparables #2 and #4 most closely resemble the subject property and therefore comprise the best evidence of assessment equity. Appellant comparable #2 identically matched the subject’s lack of a garage, bathroom count, and basement size, and was only slightly superior to the subject in terms of livable square footage and fireplace inclusion. Similarly, both selected board of review comparables featured more living space than the subject, and had larger basements; a fireplace each; and at least a one-car garage, placing these properties at the high end of the range of equitable assessments for the subject improvement. Because the subject’s assessment of \$18.80 per living square foot falls inside the equitable range of \$16.48 to \$19.66 per improvement square foot, PTAB finds the

¹ PTAB observes that in its “Notes on Appeal,” the county board of review referenced its 2023 decision from which the appellant appeals. PTAB accordingly adopts the total assessment value reflected in that decision, minor discrepancies in the “Notes on Appeal” notwithstanding.

appellant failed to show by clear and convincing evidence that the subject assessment was inequitable or that a reduction thereof is 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: 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Sheila Stein, by attorney:
Robert Rosenfeld
Robert H. Rosenfeld & Associates, LLC
40 Skokie Blvd
Suite 150
Northbrook, IL 60062

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602