



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

APPELLANT: Richard Waters  
DOCKET NO.: 22-48209.001-R-1  
PARCEL NO.: 03-19-317-023-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Richard Waters, the appellant, by attorney Stephanie Park, of Park & Longstreet, P.C. in Inverness; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, PTAB hereby finds **A Reduction** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

**LAND:** \$6,316  
**IMPR.:** \$66,684  
**TOTAL:** \$73,000

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**

A 3,832 square feet, two-story frame structure on an 8,712 square feet parcel in Arlington Heights, Wheeling Township, Cook County comprises the subject property. The 23-year-old, class 2-08 residence per the Cook County Real Property Assessment Classification Ordinance featured 3.5 bathrooms, air conditioning, a two-car garage, and a full basement.

The appellant pleads both assessment inequity and property overvaluation as the bases of the petition and requests the Property Tax Appeal Board (PTAB) reduce the assessment to \$17.37 per improvement square foot. To show the subject assessment is inequitable, the appellant put forth five class 2-08 properties within .93 miles of the subject as comparators for assessment equity. These suggested comparables included 2.5 to 4.5 bathrooms, air conditioning, and a two- or three-car garage. The appellant's selections spanned 13 to 23 years in building age; 3,806 to 4,140 square feet in improvement area; and \$17.37 to \$19.66 per square foot in improvement assessment.

As for the overvaluation contention, the appellant submitted an appraisal opining that the market valued the subject at approximately \$730,000 as of January 1, 2022 using the sales comparison approach. The appraiser relied on three sales of suggested comparables within one mile of the subject property for amounts ranging from \$680,000 to \$818,000, or between \$172.81 and \$224.54 per square foot of living area. Explaining that the subject improvement location was a highly salient feature in the subject's valuation, the appraiser justified using only three sales within a narrower geographic area before adjusting the sales prices to account for differences between the comparables and the subject. After applying the adjustments, the appraiser determined that the subject's market value was \$730,000.

The board of review countered that the subject improvement assessment of \$79,683, or \$20.79 per living square foot, was equitable in its "Notes on Appeal."<sup>1</sup> In defense of the \$85,999 total subject assessment, the county board of review proposed four two-story improvements in the subject's subarea as evidence of equitable assessment. The county board of review's preferred comparators included air conditioning, 4.5 bathrooms, and a 2.5- or three-car garage. These nearby properties were four to ten years in building age; 3,859 to 4,125 in improvement area; and \$22.48 to \$28.58 per living square foot in improvement assessment. For two of these properties, the board of review included sales information. These properties sold in February 2019 and February 2022 for \$999,000 and \$925,000, or \$258.88 and \$226.27 per square foot, respectively.

### **Conclusion of Law**

The taxpayer contends both that the market value of the subject property is not accurately reflected in its assessment for property tax purposes and that the assessment is inequitable. 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 mandate 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 market value is the basis of the appeal, by contrast, the appellant must prove the value of the property by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). Proof of market value may consist of an appraisal or recent sale of the subject property, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant met this burden of proof and a reduction in the assessment is merited.

In this record, the best evidence of market value resides in the appraisal submitted by the appellant. A certified residential real estate appraiser attested to the appraisal's compliance with industry standards and included justifications for some of the adjustments, calculations, and assumptions used in the valuation based on proximal sales. By contrast, the board of review submitted two sales that contained unadjusted raw sales figures—one of which occurred nearly

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<sup>1</sup> PTAB observes that in its "Notes on Appeal," the county board of review referenced the 2023 decision from which the appellant petitions. PTAB accordingly adopts the total assessment value reflected in that decision, minor discrepancies in the "Notes on Appeal" notwithstanding.

three years prior to the assessment date. Accordingly, PTAB finds the appellant credibly established the market valued the subject at \$730,000 in 2022. Because the \$73,000 subject assessment reflects a market value that exceeds the value established in this record (when applying the 10% assessment level for class two properties under the Cook County Real Property Assessment Classification Ordinance), PTAB concludes an assessment reduction is justified on this basis. And because overvaluation suffices as a basis for reducing a property tax assessment, PTAB declines to further evaluate the assessment inequity evidence. In summary, PTAB finds the appellant showed overvaluation by a preponderance of the evidence and the proper subject assessment for the tax year in question is \$73,000.

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:

March 17, 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

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