



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

APPELLANT: David Katz  
DOCKET NO.: 22-48273.001-R-1 through 22-48273.002-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are David Katz, the appellant, by attorney Jeremy 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, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
22-48273.001-R-1	14-33-302-063-0000	34,100	0	\$34,100
22-48273.002-R-1	14-33-302-064-0000	34,100	315,959	\$350,059

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 two parcels, one of which is improved with a 2-story dwelling of masonry exterior construction with 5,850 square feet of living area that is approximately 24 years old. The subject dwelling has a concrete slab foundation and features 5 full and 2 half-baths, central air conditioning, 2 fireplaces, and a 2-car garage. The property has a combined 5,456 square foot site and is located in Chicago, North Chicago Township, Cook County. The subject is classified as a class 2-09 property<sup>1</sup> under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement only as the basis of the appeal. The appellant is not contesting the land assessment of either parcel. In support of this

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<sup>1</sup> Two-or-more story residence, any age, with 5,000 square feet or more of living area.

claim, the appellant submitted information on four equity comparables located from .2 to .4 of a mile from the subject and within the same assessment neighborhood code as the subject property. The comparables consist of class 2-09 "two or more story" dwellings of masonry exterior construction ranging in size from 5,038 to 5,425 square feet of living area and ranging in age from 16 to 139 years old. Three homes each have a full basement with an undisclosed finished area, and one dwelling has a concrete slab foundation. Each comparable features central air conditioning; three comparables have from 1 to 4 fireplaces; and three comparables have a 2-car garage. The comparables have improvement assessments that range from \$236,425 to \$259,315 or from \$46.93 to \$49.66 per square foot of living area. The appellant's counsel also submitted a brief requesting a reduction to the subject's improvement assessment.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted the final decision of the board of review disclosing the combined total assessment for both parcels of \$384,159. The appellant also disclosed that the subject has an improvement assessment of \$315,959 or \$54.01 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted a grid analysis with information on four equity comparables which are located within ¼ of a mile from the subject or within the same subarea as the subject with each being in the same assessment neighborhood code as the subject property. The comparables consist of 3-story, class 2-09 dwellings of masonry exterior construction ranging in size from 5,049 to 5,491 square feet of living area and ranging in age from 3 to 30 years old. Three comparables feature a full or a partial basement with a recreation room and one dwelling has a concrete slab foundation. Each comparable has central air conditioning and a 2-car or a 3-car garage. Three comparables have 1 or 4 fireplaces. The comparables have improvement assessments ranging from \$326,245 to \$340,145 or from \$59.41 to \$65.10 per square foot of living area.

### **Conclusion of Law**

The taxpayer 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 a total of eight equity comparables in support of their positions. The Board finds that none of the parties' comparables are truly similar to the subject as each differs from the subject in dwelling size, age, foundation, garage feature, and/or design. Nevertheless, the Board gave less weight to appellant's comparable #4 due to being 139 years old, compared to the subject which is 24 years old. The remaining comparables are each smaller in dwelling size, thus requiring upward adjustments in order to make them more equivalent to the subject. Conversely, all but two comparables have basements, a feature that the subject lacks, therefore requiring downward adjustments to these comparables for these superior characteristics relative to the subject. On this record, the Board finds the best equity comparables have improvement

assessments ranging from \$236,425 to \$340,145 or from \$46.93 to \$65.10 per square foot of living area. The subject's improvement assessment of \$315,959 or \$54.01 per square foot of living area falls well within the range established by the best comparables in this record both in terms of overall improvement assessment and on a per square foot of living area basis.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

After considering adjustments to the comparables in this record for differences from the subject, the Board finds that the appellant did not establish by clear and convincing evidence that the subject's improvement is inequitably assessed and, therefore, a reduction in the subject's improvement assessment is not warranted.

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: \_\_\_\_\_

September 16, 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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