

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: James Liggett
DOCKET NO.: 22-50277.001-R-1
PARCEL NO.: 04-35-203-007-0000

The parties of record before the Property Tax Appeal Board are James Liggett, 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 <u>no change</u> 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:** \$12,720 **IMPR.:** \$80,079 **TOTAL:** \$92,799

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 two-story dwelling of frame exterior construction with 2,929 square feet of living area. The dwelling is approximately 7 years old. Features of the home include a full basement with finished area, central air conditioning, a fireplace and a two-car garage. The property has a 7,950 square foot site and is located in Glenview, Northfield Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument, the appellant submitted information on three comparables that have the same property classification code and assessment neighborhood code as the subject. The comparables are

<sup>&</sup>lt;sup>1</sup> The board of review disclosed the subject dwelling has a formal recreation in the basement, which was not refuted by the appellant.

located approximately .2 or .8 of a mile from the subject property and are improved with two or more-story dwellings of frame or frame and masonry exterior construction. The dwellings range in size from 2,932 to 3,259 square feet of living area and are from 17 to 19 years old. The comparables each have a full basement with the finished basement area reported as "n/a." Each comparable has central air conditioning, a fireplace and a two-car garage. The comparables have improvement assessments ranging from \$74,064 to \$80,376 or from \$22.73 to \$26.25 per square foot of living area.

Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$72,551 or \$24.77 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$92,799. The subject property has an improvement assessment of \$80,079 or \$27.34 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four comparables that have the same property classification code and assessment neighborhood code as the subject. The comparables are located within the same block and along the same street as the subject or within the subject's subarea and are improved with two-story dwellings of frame exterior construction. The dwellings range in size from 2,810 to 3,410 square feet of living area and are from 3 to 10 years old. The comparables each have a full basement with finished area, central air conditioning, one or two fireplaces and a two-car garage. The comparables have improvement assessments ranging from \$76,769 to \$120,123 or from \$27.32 to \$35.64 per square foot of living area.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

#### **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 seven comparable properties for the Board's consideration. The Board has given less weight to the appellant's comparables, as well as board of review comparable #1 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 #2, #3 and #4, which are overall more similar to the subject in location, dwelling size, design, age and some features. The comparables have improvement assessments ranging from \$76,769 to \$106,207 or from \$27.32 to \$35.64 per square foot of living area. The subject's improvement assessment of \$80,079 or \$27.34 per square foot of living area falls within the range established

by the best comparables in the record. After considering adjustments to the best comparables for differences from the subject, 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.

| 2            | 1. Fer         |
|--------------|----------------|
|              | Chairman       |
| C. L. R.     | Robert Stoffen |
| Member       | Member         |
| Dan De Kinin | Sarah Bokley   |
| 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.

| October 21, 2025   |
|--------------------|
| 1111216            |
| Child Park Table 1 |
|                    |

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 <u>PETITION AND EVIDENCE</u> 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**

James Liggett, by attorney: Jeremy 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