

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Michael Colman
DOCKET NO.: 22-50810.001-R-1
PARCEL NO.: 04-04-304-169-0000

The parties of record before the Property Tax Appeal Board are Michael Colman, 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, 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:** \$9,998 **IMPR.:** \$45,000 **TOTAL:** \$54,998

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 2-story dwelling of frame and masonry exterior construction with 2,488 square feet of living area. The dwelling is approximately 31 years old. The home features a full basement, 2 full and 1 half bathrooms, central air conditioning, a fireplace and a 2-car garage The property has a 3,786 square foot site and is located in Northbrook, Northfield, Cook County. The subject is classified as a class 2-95 townhome or row house property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on four comparables located within the same assessment neighborhood as the subject and from 36 feet to 0.4 of a mile from the subject property. The comparables are improved with class 2-95 dwellings of frame and masonry exterior construction ranging in size from 2,720 to 2,932 square feet of living area.

The dwellings are 22 to 31 years old. Each comparable has a partial or full basement, 2 full and 1 half bathrooms, central air conditioning, a fireplace and a 2-car garage. The comparables have improvement assessments that range from \$46,000 to \$50,000 or from \$16.36 to \$17.28 per square foot of living area. Based on this evidence, the appellant requested a reduction in the subject's improvement assessment to \$42,271 or \$16.99 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the Cook County Board of Review final decision for the 2022 tax year disclosing the total assessment for the subject of \$54,998. The subject property has an improvement assessment of \$45,000 or \$18.09 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five grid sheets, each containing four comparables numbered #1 through #4. For clarity in the record, the comparables in the 4 additional grids have been renumbered in consecutive order as comparables #5 through #20. The comparables are located within the same assessment neighborhood and the same block as the subject property. The dwellings consist of class 2-95, 2-story dwellings of frame and masonry exterior construction ranging in size from 2,039 to 2,671 square feet of living area. The dwellings are 26 to 31 years old. Each comparable has a partial or full basement, 2 or 3 full bathrooms, central air conditioning, a fireplace, and a 2-car garage. Seventeen comparables have 1 or 2 half bathrooms. The comparables have improvement assessments that range from \$38,750 to \$52,000 or from \$18.09 to \$21.02 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 24 equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1 and #2 as well as the board of review's comparables #6, #8, #9, #11, #12, #13 and #19 due to differences in their subject in dwelling sizes or larger number of bathrooms when compared to the subject.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables. These comparables are located within the same assessment neighborhood and the same block as the subject and are overall most similar to the subject in dwelling size, age, bathroom count and other features. These fifteen comparables have improvement assessments ranging from \$46,000 to \$50,000 or from \$17.28 to \$19.62 per square foot of living area. The subject's improvement assessment of \$45,000 or \$18.09 per square foot of living area falls below the range established by the best comparables in the record on an overall basis and within the range on a per-square-

foot basis. Based on this evidence, 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.

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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
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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**

Michael Colman, 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