



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

APPELLANT: Hollyberry Investments
DOCKET NO.: 22-52586.001-R-1
PARCEL NO.: 10-34-123-028-0000

The parties of record before the Property Tax Appeal Board are Hollyberry Investments, the appellant, by attorney John J. Piegore, of Sanchez, Daniels & Hoffman LLP in Chicago; 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: \$8,400
IMPR.: \$28,600
TOTAL: \$37,000

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 6,000 square foot parcel improved with a 1-story dwelling of masonry exterior construction with 1,356 square feet of living area that is approximately 71 years old. The features of the subject include 1 bathroom and a full unfinished basement. The property is located in Lincolnwood, Niles Township, Cook County. The subject is classified as a class 2-03 property¹ 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 equity comparables located less than one mile from the subject and all within the same assessment neighborhood code as the subject property. The comparables consist of 1-story, class 2-03 single family dwellings of masonry exterior construction ranging in size from 1,493 to 1,649 square

¹ One-story residence, any age, with 1,000 to 1,800 square feet of living area.

feet of living area and ranging in age from 67 to 73 years old. Each comparable features 1, 1½, or 2 baths, a full basement with undisclosed finished area, and central air conditioning. Three comparables each have 1 fireplace and a 1-car or a 1.5-car garage. The comparables have improvement assessments that range from \$25,500 to \$29,760 or from \$17.08 to \$18.05 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" disclosing the total assessment for the subject property of \$37,000. The subject has an improvement assessment of \$28,600 or \$21.09 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 located within the same (survey) block as the subject and within the same assessment neighborhood code as the subject property. The comparables consist of 1-story, class 2-03 dwellings of masonry exterior construction ranging in size from 1,109 to 1,230 square feet of living area and being either 68 or 70 years old. The comparables each feature 1 or 1½ baths, a full or partial basement (two being finished with recreation rooms), and a 1-car or a 1.5-car garage. Two dwellings have central air conditioning. The comparables have improvement assessments ranging from \$25,797 to \$30,920 or from \$21.88 to \$27.88 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 of the appellant's comparables are larger in dwelling size and each of the board of review comparables are smaller in dwelling size relative to the subject. Additionally, all but one of the comparables submitted by the parties have a garage, and all but two comparables have central air conditioning, both features that the subject lacks. These differences from the subject suggest that both upward and downward adjustments are needed to each of the comparables in the record to make them more equivalent to the subject. Lastly, the appellant did not disclose the basement finish areas of the comparables, thus rendering a meaningful comparative analysis with the subject difficult to support.

Nevertheless, the comparables in this record have improvement assessments ranging from \$25,500 to \$30,920 or from \$17.08 to \$27.88 per square foot of living area. The subject's improvement assessment of \$28,600 or \$21.09 per square foot of living area falls within the range established by the equity comparables in this record both in terms of overall improvement

assessment and on a per square foot of living area basis. 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: _____

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

Hollyberry Investments, by attorney:
John J. Piegore
Sanchez, Daniels & Hoffman LLP
333 West Wacker Drive
Suite 500
Chicago, IL 60606

COUNTY

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