



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

APPELLANT: T. S. Shankar  
DOCKET NO.: 22-52886.001-R-1  
PARCEL NO.: 04-10-311-020-0000

The parties of record before the Property Tax Appeal Board are T. S. Shankar, the appellant, by Richard Shapiro, attorney-at-law in Evanston, and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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:** \$11,880  
**IMPR.:** \$16,120  
**TOTAL:** \$28,000

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 is improved with a one-story dwelling of frame and masonry construction containing 1,281 square feet of living area. The dwelling was built in 1952 and is approximately 70 years old. Features of the home include a partial basement, one bathroom, and a carport.<sup>1</sup> The property has a 7,425 square foot site located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-03 property under the Cook County Real Property Assessment Classification Ordinance.

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<sup>1</sup> The appellant indicated on the petition the subject does not have central air conditioning. The appellant's appraiser indicated on page 2 of the report the subject has no cooling, however, in the grid analysis the appraiser indicated the subject has central air conditioning. The board of review indicated the subject did not have central air conditioning. The appellant's appraiser also indicated the subject has an unfinished basement while the board of review indicated the subject has a partial basement with a formal recreation room.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$280,000 as of January 1, 2022. The appraisal was prepared by James A. Matthews, an Illinois Certified General Real Estate Appraiser. The purpose of the appraisal was to estimate the fair market value as of the effective date of the appraisal. The fee simple property rights were appraised. The appraiser indicated the highest and best use of the property as improved is the present use.

In describing the property, the appraiser indicated the subject home has two bedrooms, one bathroom and a partial unfinished basement. He further asserted the interior of the subject is very dated with modernization needed. The appraiser also explained the subject is located close to train tracks which is a negative for resale and further indicated the subject would sell at the lower end of the range due to condition and lack of amenities. The report included copies of photographs of the exterior and interior of the subject property.

The appraiser developed the cost approach to value and the sales comparison approach to value to estimate the market value of the subject property. Using the cost approach the appraiser first estimated the site value to be \$200,000 based on sales in the area. The appraiser estimated the cost new of the improvements using the Marshall and Swift's Cost Handbook. The building improvements were estimated to have a cost new of \$132,585. Physical depreciation was estimated to be \$70,708 based on the age/life technique. The appraiser determined the subject suffered from \$6,629 in external obsolescence due to the property's location near train tracks. Deducting for depreciation resulted in a depreciated value of the improvements of \$55,248. To the depreciated value of the building improvements the appraiser added \$30,000 for the "as is" value of the site improvements and the land value to arrive at an indicated value under the cost approach of \$285,248.

The appraiser developed the sales comparison approach to value using six comparable sales improved with one-story dwellings of brick, brick and frame, or brick and stone exterior construction that range in size from 864 to 1,426 square feet of living area. The dwellings range in age from 66 to 71 years old. Three comparables have a partial or full basement with one having finished area, three comparables have central air conditioning, two comparables have one or two fireplaces, and four comparables have a 1-car or a 2-car garage. The comparables have 1, 1½ or 2 bathrooms. These properties have sites ranging in size from 7,108 to 9,095 square feet of land area. The comparables are located in Northbrook from .31 to .94 of a mile from the subject. The sales occurred from June 2020 to September 2021 for prices ranging from \$224,000 to \$268,000 or from \$185.83 to \$310.19 per square foot of living area, including land. The appraiser adjusted the comparables for differences in lot size at \$3.00 per square foot of land area and each sale was adjusted for differences in building size at \$40.00 per square foot. The report indicated comparable #2 was adjusted for financing. Comparables #3, #5 and #6 were adjusted for bedroom count. The sales were also adjusted for differences from the subject in various amenities. The adjusted prices ranged from \$211,981 to \$290,455. The appraiser estimated the subject had an indicated value under the sales comparison approach of \$280,000.

In reconciling the two approaches to value the appraiser gave most weight to the sales comparison approach and arrived at an estimated market value of \$280,000 as of January 1, 2022. The appellant requested the subject's total assessment be reduced to \$28,000 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$34,000. The subject's assessment reflects a market value of \$340,000 or \$265.41 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales composed of class 2-03 properties improved with one-story dwellings of frame and masonry exterior construction that range in size from 1,065 to 1,348 square feet of living area. The dwellings are 71 or 74 years old. Each property has a partial basement with two having finished area, 1 or 1½ bathrooms, and a 1-car, 1.5-car or 2-car garage. Three comparables have central air conditioning and three comparables have one fireplace. These properties have sites ranging in size from 7,425 to 8,637 square feet of land area. The comparables have the same assessment neighborhood code as the subject and are located ¼ of a mile from the subject property. The sales occurred from October 2020 to August 2021 for prices ranging from \$430,000 to \$516,000 or from \$359.79 to \$424.88 per square foot of living area, including land.

In rebuttal the board of review asserted that appraisal comparable sales #1, #3 and #6 have excessive gross adjustments; comparable sales #1 and #3 have 30% less square feet of living areas than the subject; and comparable sale #2 was a cash sale.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appellant's appraiser developed both the cost approach to value and the sales comparison approach to value in estimating the market value of the subject property. The appraiser explained the subject dwelling is very dated and in need of modernization and further opined the subject would sell at the lower end of the range due to condition and lack of amenities. In developing the sales comparison approach to value, the appraiser adjusted the sales for differences from the subject and explained the adjustments made for dissimilarities in land area and dwelling size. The adjustments appeared logical and consistent. In reconciling the two approaches to value most weight was given the sales comparison approach and the appraiser estimated the subject had a fair cash value of \$280,000 as of January 1, 2022. The subject's assessment reflects a market value of \$340,000 which is above the appraised value.

The board of review provided four comparable sales that have varying degrees of similarity to the subject. The board of review comparables were not adjusted to account for any differences from the subject property, which detracts from the weight that can be given this evidence.

Based on this record, giving most weight to the appraisal submitted by the appellant, the Board finds a reduction in the subject's assessment commensurate with the appellant's request is 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.



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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

T.S. Shankar, by attorney:  
Richard Shapiro  
Attorney at Law  
990 Grove St.  
Suite 409  
Evanston, IL 60201

COUNTY

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