

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Diane Katz

DOCKET NO.: 22-53122.001-R-1 PARCEL NO.: 04-17-213-007-0000

The parties of record before the Property Tax Appeal Board are Diane Katz, the appellant, by attorney Abby L. Strauss, of Schiller Law P.C. 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 <u>A Reduction</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:** \$19,804 **IMPR.:** \$47,195 **TOTAL:** \$66,999

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 3,842 square feet of living area. The dwelling is approximately 51 years old. The home features a partial basement, 2 full and 1 half bathrooms, central air conditioning, a fireplace and a 2-car garage. The property has a 13,203 square foot site and is located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-08 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 six equity comparables located within the subject's same assessment neighborhood and from 0.10 of a mile to 1.20 miles from the subject property. The comparables consist of class 2-08, 2-story dwellings of frame and masonry exterior construction ranging in size from 3,825 to 4,624 square

feet of living area. The dwellings are 0 to 51 years old. Each comparable has a partial or a full basement, 2 to 5 full and 1 half bathrooms, central air conditioning, 1 or 2 fireplaces and either a 2-car, a 2.5-car or a 3-car garage. The comparables have improvement assessments that range from \$29,232 to \$57,760 or from \$6.60 to \$12.84 per square foot of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$42,069 or \$10.95 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 \$70,999. The subject property has an improvement assessment of \$51,195 or \$13.33 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables that are located within the subject's same assessment neighborhood and within the subject's same block or approximately ¼ of a mile from the subject property. The comparables consist of 2-story dwellings of masonry or frame and masonry exterior construction ranging in size from 3,839 to 3,923 square feet of living area. The dwellings are 31 to 49 years old. Each comparable has a partial or a full basement, 2 to 4 full and 1 or 2 half bathrooms, central air conditioning, 1 or 2 fireplaces and a 2-car or a 3-car garage. The comparables have improvement assessments that range from \$52,961 to \$59,370 or from \$13.50 to \$15.28 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted ten comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2, #3, #4 and #6 as well as the board of review comparables #1, #3 and #4 due to significant differences in their dwelling sizes and/or newer ages when compared to the subject. In addition, the appellant's comparables #3, #4 and #6 are located over a mile away from the subject property.

The Board finds the best evidence of assessment equity to be the parties' remaining comparables which are overall more similar to the subject in location, design, age, dwelling size and other features. However, the subject has fewer number of bathrooms than both of these comparables and one fewer fireplace than appellant's comparable #5, suggesting downward adjustments for these features would be appropriate to make the comparables more equivalent to the subject. These two comparables have improvement assessments of \$49,115 and \$52,961 or \$12.84 and \$13.50 per square foot of living area, respectively. The subject's improvement assessment of

\$51,195 or \$13.33 per square foot of living area is bracketed by the two best comparables in the record. After considering adjustments to the two best comparables for differences to the subject, the Board finds the subject's improvement assessment is excessive. Based on this record, the Board finds the subject's improvement was inequitably assessed and a reduction in the subject's assessment 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.

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	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
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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**

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# **COUNTY**

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