



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

APPELLANT: Rachel & Jason Taylor
DOCKET NO.: 22-55902.001-R-1
PARCEL NO.: 04-09-316-008-0000

The parties of record before the Property Tax Appeal Board are Rachel & Jason Taylor, the appellants, by attorney Herbert B. Rosenberg, of Rock Fusco & Connelly, LLC 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: \$17,982
IMPR.: \$64,018
TOTAL: \$82,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 construction with 3,310 square feet of living area¹ that is approximately 53 years old. Features of the home include 3 baths, a partial basement finished with a recreation room, central air conditioning, 1 fireplace, and a 2-car garage. The property has an 11,988 square foot site and is located in Northbrook, Northfield Township, Cook County. The property is a class 2-78 property² under the Cook County Real Property Assessment Classification Ordinance.

¹ The appellants' appraiser reported a dwelling size of 3,310 square feet and the assessing officials reported a dwelling size of 3,360 square feet in the grid analysis but failed to provide a copy of the subject's property record card or any other support for the stated dwelling size. The appellants' appraiser noted this discrepancy and stated that the appraiser inspected the interior and the exterior of the subject dwelling and included a schematic diagram with measurements of the subject dwelling. Based on this evidence and the lack of supporting evidence from the board of review, the Board has accepted the appraiser's stated dwelling size.

² Two-or-more story residence, up to 62 years of age, with 2,001 to 3,800 square feet of living area.

The appellants contend overvaluation as the basis of the appeal. In support of this argument, the appellants submitted a Restricted Appraisal Report prepared by Lilie Toshev, a Certified Residential Real Estate Appraiser. The appraiser noted that the purpose of the appraisal is to obtain a retrospective opinion of market value of fee simple interest in the subject premises utilizing the sales comparison approach to value. The appraiser further noted that the appraisal "is intended only for the use of the client and any other named intended user(s). Users of this report must clearly understand that the report may not contain supporting rationale for all of the opinions and conclusions set forth in the report." The appraiser estimated the subject property had a market value of \$630,000 as of January 1, 2022.

Utilizing only the sales comparison approach to value, the appraiser analyzed four comparable sales located from .06 to .19 of a mile from the subject property. The comparables were described as sites ranging in size from 11,988 to 12,236 square feet of land area which have been improved with Colonial or split-level dwellings of varying exterior construction. The homes range in age from 50 to 55 years old and range in size from 2,472 to 3,555 square feet of living area. Each comparable has a partial or full basement, two of which are finished with recreation rooms. Each comparable also has central air conditioning and a 2-car garage. Three comparables each have 1 fireplace. The sales occurred from June 2019 to January 2021 for prices ranging from \$505,000 to \$650,000 or from \$142.05 to \$232.97 per square foot of living area, including land. After making adjustments to comparables for sale concession, and differences from the subject in condition, room count, dwelling size, basement/finished area, functional utility, number of fireplaces, and/or patio//porch/deck, the appraiser estimated the comparables had adjusted sales prices ranging from \$620,450 to \$641,000.

Appellants' counsel also submitted a brief analyzing the comparables utilized by the appraiser and, based on the evidence submitted, requested a reduction to the subject's assessment 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 \$82,000. The subject's assessment reflects a market value of \$820,000 or \$247.74 per square foot of living area, including land, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted information on three comparable sales located within ¼ of a mile, the same subarea, or the same (PIN) block from the subject and all located within the same assessment neighborhood code as the subject property. The comparables were described as lots ranging in size from 11,988 to 18,768 square feet of land area which have been improved with 2-story, class 2-78 dwellings of frame or frame and masonry exterior construction. The homes range in age from 47 to 58 years old and range in size from 2,699 to 3,075 square feet of living area. Each home has a full or partial unfinished basement, central air conditioning, 1 fireplace, and a 2-car garage. The sales occurred from January 2021 to October 2022 for prices ranging from \$840,000 to \$1,088,000 or from \$287.87 to \$353.82 per square foot of living area, including land.

In rebuttal, the appellants' counsel submitted a brief contending that the board of review did not meet its burden to support the assessment as there was no appraisal submitted but rather only raw (unadjusted) sales. The appellants' counsel argued that the board of review did not present any evidence that the comparables sales were arm's length transactions. Specifically, counsel noted that comparable #1 sold "within just days" of its MLS listing which was described by an internet listing agency as a "private" listing. As to board of review comparables #2 and #3, counsel argued that these comparables are dissimilar from the subject in important characteristics.

Conclusion of Law

The appellants contend that 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

Initially, with regard to the appellants' argument in rebuttal as to the arm's length nature of the board of review's sale transaction(s), the Board finds that neither party submitted the Illinois Real Estate Transfer Declaration (PTAX-203) forms associated with the sales of any of the comparable properties. Moreover, while the appellants' counsel argued that board of review comparable sale #1 was a "private sale," counsel expressly states that this property was listed for sale through the Multiple Listing Service (MLS) which undermines the argument that this sale lacked the fundamental elements of an arm's length transaction.

The record contains a Restricted Appraisal Report submitted by the appellants and three comparable sales submitted by the board of review. The Property Tax Appeal Board recognizes that as provided in the Uniform Standards of Professional Appraisal Practice, a Restricted Appraisal Report is for client use only. (See Advisory Opinion 11 (AO-11), *Uniform Standards of Professional Appraisal Practice, 2002 Edition*, The Appraisal Foundation, p. 146; *Uniform Standards of Professional Appraisal Practice and Advisory Opinions, 2006 Edition*, The Appraisal Foundation, p. 137. See also Standard Rule 2-2(c), *Uniform Standards of Professional Appraisal Practice, 2002 Edition*, The Appraisal Foundation, p. 27; and *Uniform Standards of Professional Appraisal Practice and Advisory Opinions, 2006 Edition*, The Appraisal Foundation, p. 28, explaining that a Restricted Use Appraisal is for client use only.) This type of report is not intended to be used by parties other than the client. In this instance the "client" was identified as the appellants, Rachel & Jason Taylor.

The Board gave less weight to the appraiser's value conclusion due to the appraiser's use of three dated sales that occurred in 2019 and 2020. Additionally, the appraiser noted that the wide range of sales prices of the comparables was "unavoidable due to the limited amount of sales that are similar to the subject property." The appraiser further noted that the "comparables utilized within this appraisal represent the most recent and similar sales as of the effective date of this appraisal..." This is questionable given that more recent sales of other similar homes within the subject's neighborhood were available for comparison as demonstrated by the comparables submitted by the board of review. In other words, the appraiser's report date of December 28, 2023 means that, at minimum, three similar properties in close proximity to the subject and

which sold within twelve months of the January 1, 2022 assessment date at issue were not utilized or commented on by the appraiser. Exclusion of these sales raises a question with respect to the comparable selection methodology employed by the appraiser. Finally, the appraiser restricted the use of the report to only his client and noted that “the report may not contain supporting rationale for all of the opinions and conclusions set forth in the report.” The Board finds that these factors undermine and detract from the credibility and reliability of the appraiser’s report in establishing the market value of the subject property as of January 1, 2022, for ad valorem taxation purposed. However, the Board will consider the raw sales contained in the appraisal report.

The record contains a total of seven comparable sales submitted by the parties in support of their respective positions. The Board gave less weight to appraiser’s comparables #2, #3, and #4 due to their sales occurring less proximate in time to the January 1, 2022 assessment date at issue and, therefore, are less likely to accurately reflect the subject’s market value as of the said lien date than the remaining comparables that sold more proximate in time to the lien date. The Board also gave less weight to appraiser’s comparable #1 and board of review comparable #3 due to significant differences from the subject in dwelling size.

The Board finds the best evidence of market value to be the board of review comparables #1 and #2 which are most similar to the subject in location, design, age, site size, dwelling size, and features. These two best comparables in the record sold in January 2021 and October 2022 for prices of \$840,000 and \$1,088,000 or \$287.87 and \$353.82 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$820,000 or \$244.05 per square foot of living area, land included, which is below the two most similar comparables in this record both in terms of overall market value and on a per square foot of living area basis. Therefore, on this record, the Board finds that the appellants did not establish by a preponderance of evidence that the subject property is overvalued and thus a reduction in the subject's 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

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