



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

APPELLANT: Francine R. Fishel
DOCKET NO.: 22-56188.001-R-1
PARCEL NO.: 04-10-200-112-0000

The parties of record before the Property Tax Appeal Board are Francine R. Fishel, the appellant, by attorney Max E. Callahan, of Siegel & Callahan, 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 **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: \$19,305
IMPR.: \$56,695
TOTAL: \$76,000

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 multi-level single-family dwelling of frame and masonry exterior construction with 2,924 square feet of living area. The dwelling is approximately 63 years old with a reported effective age of 50 years. Features of the home include a partial basement/lower level with finished area, central air conditioning, a fireplace, an attached two-car garage and a patio. The property has a 9,900 square foot site¹ and is located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The appraiser stated the assessing officials incorrectly assert the subject parcel contains 14,850 square feet of land area. According to survey and county tax map data, the site is actually 9,900 square feet of useable land. There is a 33 foot extension protruding eastward which is used as a common access road for the neighborhood.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared by Gregory Nold, a Certified General Real Estate Appraiser, estimating the subject property had a market value of \$630,000 as of January 1, 2019.² For purposes of estimating the subject's fee simple retrospective market value for purposes of *ad valorem* taxation, the appraiser solely used the sales comparison approach. The subject property was inspected on February 23, 2023 at which time Nold determined the home was of average quality construction and was adequately maintained. However, Nold determined the presence of external obsolescence as the dwelling was 50 feet from Dundee Road (IL Route 68), a very busy 4-lane road passing the subject road at 40-50 miles per hour and an average daily traffic count of 24,800. Furthermore, the subject road is used as a cut-through between Shermer Road and IL Route 68 raising the traffic volume for this residential road where speed bumps have been installed to mitigate the problem. The appraisal report was signed on March 31, 2023. One of the photographs in the report depicting stairs with no baseboard finish on the drywall is identified as "functional obsolescence" although this form of depreciation is not addressed anywhere else in the appraisal.

The appraiser selected six comparable sales located in Northbrook which are from .03 to .39 of a mile from the subject. The comparable sites range in size from 10,942 to 16,400 square feet of land area and are improved with a split level, a one-story and four two-story dwellings³ of frame or frame and masonry exterior construction. The homes range in age from 34 to 96 years old. The homes range in size from 1,970 to 4,077 square feet of living area. The comparables each have a full or partial basement four of which have finished area. Features include central air conditioning, a two-car garage and a patio, deck, balcony, or enclosed porch. The comparables sold from June 2020 to June 2021 for prices ranging from \$342,000 to \$725,000 or from \$139.02 to \$299.49 per square foot of living area, including land.

Next, the appraiser applied adjustments to the comparables for differences from the subject in location, site size, design quality, bathroom count, dwelling size, basement finish, outdoor amenities, fireplace count, and/or kitchen/bath finishes. Based on the adjustment process, adjusted sales prices were determined to range from \$459,800 to \$646,700.

In addition, as part of the report, Nold described a secondary analysis of the sales which he considered based on unadjusted sales prices per square foot. The sales ranged from \$139.02 to \$299.49 per square foot of living area, including land. The median in this analysis was \$206.95, which was "most significantly influenced by building and land sizes, street location, utility, and condition. From this analysis, Nold determined a per-square-foot indicator near the middle of the range was appropriate due to the subject's relative building and land sizes, and undesirable street location, while also factoring its above average utility. From this Nold opined a final market value opinion of \$630,000 or \$215.46 per square foot of living area, including land. Based on this evidence, the appellant requested that the assessment be reduced to reflect the appraised value conclusion.

² The cover sheet on the appraisal, the cover letter, the summary of salient features and page 1 of the appraisal report, each depict valuation as of January 1, 2022, however, the valuation date set forth in the reconciliation references 2019.

³ Supporting documentation included with the appraisal depicts the comparable #4 is a 1.5-story dwelling.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$76,000. The subject's assessment reflects a market value of \$760,000 or \$259.92 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, two of which are located in the same neighborhood code, in Northbrook, and ¼ of a mile from the subject property. The other two comparables are located in Glenview. The comparable parcels range in size from 12,060 to 27,922 square feet of land area. Each comparable is improved with a class 2-34 split-level dwelling of frame and masonry exterior construction. The comparables are either 61 or 65 years old and the comparables range in size from 1,415 to 2,817 square feet of living area. Each comparable has a partial basement/lower level with finished area. Features include central air conditioning, a fireplace and a two-car garage. The comparables sold from April 2019 to December 2021 for prices ranging from \$549,000 to \$1,397,302 or from \$387.71 to \$987.49 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant asserted that the board of review submitted "at most nothing other than raw, unadjusted assessment and sales data which has historically been unpersuasive in this venue."

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

The appellant submitted an appraisal of the subject property with an opinion of value as of January 1, 2019, two full years prior to the lien date at issue herein, and the board of review submitted four comparable sales to support their respective positions before the Property Tax Appeal Board. The Board finds the appellant's appraisal has not presented a credible or reliable indication of the subject's market value for several reasons. The appraiser utilized two of six sales that occurred in 2020, dates that are more remote in time to the lien date at issue and illogical sales for consideration of a value as of January 1, 2019. Moreover, the appraisal specifies two distinctly different valuation dates calling into question the final value opinion that was determined as of a given date. The Board finds the appraiser's failure to address the purported functional obsolescence of the home is troubling and suggests an incomplete analysis. Furthermore, the Board finds the appraiser's analysis of the locational issue related to the subject property appears to be overblown as the subject is not directly on a busy street and there is no indication that the nearby main traffic artery was recently created. Only one of the six comparable properties is of the same split-level design as the subject and yet only comparable #6 was adjusted for "quality of construction." Finally, the Board finds it highly suspicious that

dwellings ranging in age from 34 to 96 years old when compared to a 63 year-old subject dwelling did not warrant any age adjustments whatsoever. Therefore, the Board having determined that the appellant's appraisal lacks credibility in terms of the opinion of value, the Board will analyze the ten raw sales presented by both parties.

In analyzing the sales in the record, the Board has given little weight to appraisal sales #2 through #6, due to differing designs when compared to the subject. The Board has given reduced weight to board of review comparable #4, due to its dated sale price in April 2019, most remote to the lien date at issue of all of the sales in the record.

The Property Tax Appeal Board finds the best evidence of market value to be appraisal sale #1 as well as board of review comparable sales #1, #2 and #3 which are each relatively similar to the subject in classification, design, foundation type and/or some features. Each of these four comparables have differing lot sizes when compared to the subject which would necessitate adjustments to make them more equivalent to the subject. Adjustments would also be necessary for differences in age, dwelling size, basement size and/or finished basement area, when compared to the subject. These four best comparables sold from September 2020 to December 2021 for prices ranging from \$549,000 to \$1,397,302 or from \$299.49 to \$987.49 per square foot of living area, including land. The subject's assessment reflects a market value of \$760,000 or \$259.92 per square foot of living area, including land, which is at the low-end of the range established by the best comparable sales in the record in terms of overall value and below the range of the best sales in the record on a per-square-foot of living area basis, including land. Given the best market value data in the record and after considering necessary adjustments to the comparables to make them more equivalent to the subject property, the Board finds the subject property is not over assessed based on its estimated market value and 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: _____

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

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