



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

APPELLANT: Douglas Rescho
DOCKET NO.: 22-58325.001-R-1
PARCEL NO.: 05-27-200-055-1089

The parties of record before the Property Tax Appeal Board are Douglas Rescho, the appellant; 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: \$5,460
IMPR.: \$34,777
TOTAL: \$40,237

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 single condominium unit within a multi-story 110-unit condominium building. The subject has 1,880 square feet of living area and a 0.9537% ownership interest in the condominium. The property is approximately 48 years old and is located in Wilmette, New Trier Township, Cook County. The subject is classified as a class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and assessment inequity with respect to both the land and improvement as the bases of the appeal.

In support of the overvaluation argument the appellant submitted evidence disclosing the subject property was purchased on February 27, 2019, for a price of \$389,865. The appellant completed Section IV – Recent Sale Data disclosing the transaction was not between family members or related corporations, that the subject was sold by the owner and was advertised in the Multiple

Listing Service (MLS). The appellant also disclosed that the property was not occupied until June 26, 2019, after renovations totaling \$12,500. To further document the sale of the subject, the appellant submitted a copy of the settlement statement which reiterated the sale date, sale price and disclosed commissions were paid to a real estate agent.

In further support of the subject's market value, the appellant submitted four comparable sales from within the subject's condominium which sold from December 2001 to July 2012 for prices ranging from \$327,500 to \$495,000.

To support the inequity argument, the appellant submitted a grid analysis with information on four equity comparables located in the same condominium development as the subject property. The comparables are improved with class 2-99 condominium units that have ownership interests ranging from 0.8174% to 0.9063%.¹ The comparables have land assessments ranging from \$6,128 to \$6,795 and improvement assessments ranging from \$34,657 to \$37,940.

The appellant also submitted a memorandum comparing the subject's 2022 assessment and sale price to the 2022 assessments and sale prices of two units with an identical ownership percentage as the subject property. These two units sold in June 2018 and September 2019 for prices of \$610,000 and \$575,000, respectively. The appellant contended the subject and these two units each have 2022 total assessments that reflect a market value of \$472,580, even though actual sale prices for the units are \$389,865, \$575,000 and \$610,000. The appellant argued the subject's sale price is an "obvious outlier" contending property tax assessments should be equitable and based on market value.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$40,785. The requested assessment reflects a total market value of \$407,850 or \$216.94 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The appellant seeks both a lower land assessment of \$6,128 and an improvement assessment of \$34,657 or \$18.43 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$47,256. The subject's assessment reflects a market value of \$472,560 or \$251.36 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The subject's assessment includes a land assessment of \$5,460 and an improvement assessment of \$41,796.

In support of its contention of the correct assessment the board of review submitted a sales analysis prepared by Lilybeth Kafka, an analyst with the Cook County Board of Review. The analyst provided sales data on 36 comparable sales of residential units in the subject's condominium property. The sales occurred from February 2019 to December 2022 for prices ranging from \$277,000 to \$829,000. The analyst reported a total consideration for these sales of \$16,936,765. The total consideration was divided by the percentage of interest of ownership in

¹ The ownership percentage for each of the appellant's comparable properties was found in the board of review's submission.

the units that sold of 33.0591% to arrive at an indicated full value for the property of \$51,231,778. The analyst applied a percentage of ownership of 98.1400% to this calculated market value which is not responsive to the subject's ownership interest of 0.9537%. After a full examination of the analysis the board of review appears to have excluded two units from the subject's condominium development, including the subject property, stating, "1049 & 1089 not part of bldg. appeal."

The board of review also submitted a copy of the Residential Real Property Disclosure Report for the subject property which indicates "No" for each entry along with a notation "Trustee of Estate." A printout from an internet website appears to document mortgage and deed documents associated with the subject property without further explanation. No dollar amounts are disclosed in this printout, only type of document and various dates. Based on this evidence the board of review requested confirmation of the subject's estimated market value as reflected by its assessment.

Conclusion of Law

The appellant contends, in part, 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 purchase of the subject property in February 2019 for a price of \$389,865 plus the cost to renovate the unit of \$12,500 or a total of \$402,365. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was for sale by owner and that the property had been advertised in the Multiple Listing Service. In further support of the transaction the appellant submitted a copy of the settlement statement which reiterated the sale date, sale price and that a commission was paid to a real estate firm. The Board finds the purchase price plus costs of renovation is below the market value reflected by the assessment.

The Board further finds the board of review did not present any evidence to challenge the arm's length nature of the sale transaction or to refute the contention that the purchase price was reflective of market value. The Board gives little weight to the board of review's condominium analysis which failed to account for the subject unit. Based on this record the Board finds the subject property had a market value of \$402,365 as of January 1, 2022. Since market value has been determined the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. 86 Ill.Admin.Code §1910.50(c)(2)

The appellant also contends assessment inequity as an alternative 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 further reduction in the subject's assessment, based on inequity is not warranted on this record.

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: _____

December 23, 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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