



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

APPELLANT: Judy Conway
DOCKET NO.: 23-20775.001-R-1
PARCEL NO.: 15-12-106-008-0000

The parties of record before the Property Tax Appeal Board are Judy Conway, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd. 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: \$16,836
IMPR.: \$89,473
TOTAL: \$106,309

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 2023 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 two-story dwelling of frame exterior construction with 3,415 square feet of living area. The dwelling is approximately 122 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace, 3 bathrooms and 2-car garage. The property has a 14,030 square foot site and is located in River Forest, River Forest Township, Cook County. The subject is classified as a class 2-06 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 five equity comparables located within the subject's assessment neighborhood code, with one comparable located on the same street as subject. The comparables are composed of class 2-06 two-story dwellings of masonry, frame or frame and masonry exterior construction, ranging in size from

3,090 to 3,572 square feet of living area. The homes are approximately 81 to 100 years old. Each property has a basement, three with finished area, 2 or 3 full and 1 or 2 half bathrooms, one or two fireplaces, and a 1-car, 2-car or 4-car garage.¹ The comparables have improvement assessments that range from \$64,234 to \$72,852 or from \$20.31 to \$22.07 per square feet of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$70,178 or \$20.55 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 \$106,309. The subject property has an improvement assessment of \$89,473 or \$26.20 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on two equity comparables located within the subject's assessment neighborhood, on the same street and same block. The comparables are composed of class 2-06 two-story dwellings of stucco or frame and masonry exterior construction of 2,743 or 3,063 square feet of living area. The comparables are approximately 108 and 118 years old. Each comparable has a basement, with one having finished area, 2 full with 1 half or 3 full with 1 half bathrooms, one or two fireplaces, and a 2.5-car or 3-car garage. The comparables have improvement assessments that range from \$74,820 to \$89,160 or \$27.28 to \$29.11 per square feet 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of nine equity comparables to support their respective positions before the Property Tax Appeal Board. The Board gives reduced weight to the appellant's comparables #1, #2, #3 and #5, as they are the least similar in age to the subject. In addition, the appellant's comparable #5 lacked central air conditioning, a feature present in the subject property. The Board also gives reduced weight to the board of review's comparable #1 due to its significantly smaller dwelling size compared to the subject.

The Board finds the best evidence of assessment equity to be the appellant's comparable #4 and the board of review's comparable #2 which are more similar to the subject in age, basement foundation, garage feature and other amenities. However, the comparables have varying degrees of similarity to the subject in other features, in particular basement finished area, dwelling and/or garage size, suggesting adjustments would be required to make the comparables more equivalent

¹ The Board finds the best description of appellant's comparables is contained in the property detail cards submitted by appellant, which the board of review did not refute.

to the subject. Nevertheless, the comparables have improvement assessments of \$65,000 and \$89,160 or of \$21.04 and \$29.11 per square foot of living area. The subject's improvement assessment of \$89,473 or \$26.20 per square foot of living area is slightly above the bracket of the two best comparables in overall improvement assessment amount but within the bracket in regard to amount per square foot of living area. Given the fact that the subject has a larger dwelling area than the highest assessed best comparable on record, and after considering other appropriate adjustments to the best comparables for differences from the subject, the Board finds that subject's higher assessment is logical. The appellant did not demonstrate with clear and convincing evidence that 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.



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:

May 19, 2026



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

Judy Conway, by attorney:
Dora Cornelio
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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