



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

APPELLANT: Harold J. Pelzer
DOCKET NO.: 23-21167.001-R-1
PARCEL NO.: 15-01-408-023-0000

The parties of record before the Property Tax Appeal Board are Harold J. Pelzer, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, 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: \$14,664
IMPR.: \$98,342
TOTAL: \$113,006

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 2-story dwelling of masonry exterior construction with 4,555 square feet of living area. The dwelling was constructed in 1925 and is approximately 98 years old. Features of the home include basement, central air conditioning and a 2-car garage. The property has a 12,038 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 overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$1,000,000 as of January 1, 2023. The appraisal was prepared by Cynthia G. McDonald, Associate Real Estate Trainee Appraiser and supervisory appraiser Edward V. Kling, a Certified General Real Estate Appraiser.

The intended use of the appraisal report was for ad valorem property tax appeal – retrospective value. The inspection date of the subject property was October, 31, 2023. Users of the report included the property owner, owner’s attorney and various taxing bodies including the Property Tax Appeal Board. The appraisers indicated in selecting the closed comparable sales, every effort was made to use the most recent, similar style units within the subject’s immediate neighborhood. And stated “the appraisers tried to choose sales that would most closely fit within the standard appraisal guidelines”.

In estimating the market value of the subject property, the appraisers developed the sales comparison approach to value selecting five comparable sales located from .15 to .83 of a mile from the subject property. The comparables have sites that range in size from 9,250 to 14,100 square feet of land area and are improved with 2-story or 3-story dwellings of average quality construction that range in size from 3,026 to 3,704 square feet of living area. The homes range in age from 64 to 102 years old. Each comparable has a basement, central air conditioning, from one to seven fireplaces and a 2-car or a 3-car garage. Comparable #5 had an inground swimming pool, tennis court and pool house. The comparables sold from January to September 2022 for prices ranges from \$880,000 to \$1,000,000 or from \$246.36 to \$312.54 per square foot of living area, land included.

The appraisers adjusted the comparables for differences with the subject in dwelling size, finished basement area, garage size, porch/patio/decks, lot location and/or fireplace counts. Appraisers also adjusted comparable #3 for sale or financing concessions arriving at adjusted sale prices of the comparables ranging from \$860,900 to \$1,041,900 and an opinion of market value for the subject of \$1,000,000.

Based on this evidence, the appellant requested the subject’s assessment be reduced to \$1,000,000 when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$113,006. The subject's assessment reflects a market value of \$1,130,060 or \$248.09 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 three comparables located within approximately ¼ of a mile or in the same subarea as the subject property. The comparables have sites that range in size from 14,615 to 18,400 square feet of land area and are improved with 2-story dwellings of masonry exterior construction that range in size from 4,406 to 4,555 square feet of living area. The homes range in age from 93 to 99 years old. Each comparable has a basement, central air conditioning, two or three fireplaces and a 2-car or a 3-car garage. The comparables sold from April 2020 to March 2022 for prices ranging from \$1,075,000 to \$1,730,000 or from \$236.00 to \$386.33 per square foot of living area, land included. Based on this evidence, the board of review requests the subject’s assessment be confirmed.

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.

As to the appellant's appraisal, the Board finds two of the comparables (#1 and #4) used by the appraisers in the sales comparison approach were 32% or 33% smaller in dwelling size than the subject, one comparable (#2) was 35 years newer than the subject, and one comparable (#5) had an inground swimming pool, tennis court and pool house which are not features of the subject. Furthermore, the Board finds there were inconsistencies and errors in the adjustment process for basement finish in the appraisal report. For example, the appraiser applied a negative \$36,000 adjustment to comparable #2 for having an unfinished basement while the subject has a superior finished basement. In addition, inconsistent adjustments were applied to the remaining comparables for finished rooms below grade. Lastly, the Board finds the \$35,000 corner lot adjustment is not supported by any market value evidence. For these reasons the Board gives less weight to the appellant's appraisal and finds the appraisers' conclusion of value to be less credible and reliable.

The Board also gives less weight to board of review comparables #1 and #2 which sold in 2020 and 2021, less proximate in time to the January 1, 2023 assessment date and less likely be reflective of market conditions as of that date.

The Board finds the best evidence of market value to be appellant's comparable #3 and board of review comparable #3 which sold proximate in time to the assessment date at issue and overall are more similar to the subject in location, age, dwelling size and features. These properties sold in January and March 2022 for prices of \$915,000 and \$1,415,000 or \$247.03 and \$321.15 per square foot of living area, including land. The subject's assessment reflects an estimated market value of \$1,130,060 or \$248.09 per square foot of living area including land, which is bracketed by the two best comparable sales contained in the record. After considering any necessary adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported and a reduction in the subject's assessment is not 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

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: June 16, 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

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