



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

APPELLANT: Anthony Giannini  
DOCKET NO.: 23-21677.001-R-1 through 23-21677.002-R-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Anthony Giannini, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
23-21677.001-R-1	05-29-102-073-0000	41,822	101,046	\$142,868
23-21677.002-R-1	05-29-102-098-0000	8,494	11,227	\$19,721

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 two parcels that are improved with a 1.5-story, Cape Cod style dwelling with 4,548 square feet of living area.<sup>1</sup> The dwelling is approximately 58 years old. Features of the home include a basement with finished area, zoned central air conditioning, two fireplaces and a two-car attached garage. The property has a site with a combined total of 51,653 square feet of land area and is located in Winnetka, New Trier Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

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<sup>1</sup> The Board finds the best description of the subject property is found in the appellant's appraisal, since the appraiser performed an interior and exterior inspection of the property on August 10, 2022. Additionally, the report contained interior and exterior photographs of the improvements.

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 \$1,300,000 as of January 1, 2022. The appraisal was prepared by Garry Nusinow, a State of Illinois Certified General Real Estate Appraiser. The purpose of the appraisal is to determine an opinion of market value of the subject property as of January 1, 2022. Nusinow described the subject to be in above average condition. The appraiser stated that physical depreciation is less than actual due to periodic renovations. No repairs are required, and no external or functional obsolescence was noted at the time of inspection.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value using five comparable sales. The comparables are improved with ranch, Colonial, Prairie or Traditional style dwellings that range in size from 4,175 to 5,460 square feet of living area. The homes range in age from 21 to 65 years old. The appraiser described the comparables to be in either average or average to average+ condition. Four comparables each have a basement, three of which have finished area. Each comparable has zoned central air conditioning, from two to five fireplaces and either a two-car, a three-car or a four-car garage. Comparable #1 has an inground swimming pool. The comparables have sites ranging in size from 34,456 to 61,075 square feet of land area and are located less than a block to .53 of a mile from the subject property. The sales occurred from December 2020 to April 2022 for prices ranging from \$1,250,000 to \$1,415,000 or from \$254.67 to \$338.92 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject dwelling in design, age, condition, bathroom count, gross living area, basement area, basement finish, and other features to arrive at adjusted prices ranging from \$1,174,500 to \$1,445,000 and opined an estimated value for the subject of \$1,300,000 or \$285.84 per square foot of living area, including land. The appellant requested the subject's total assessment be reduced to \$130,000 to reflect the appraised value.

The appellant provided a copy of the Cook County Board of Review decision for the 2022 tax year disclosing the combined total assessment for the subject's two parcels of \$162,589. The subject's assessment reflects a market value of \$1,625,890 or \$357.50 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% as determined by the Illinois Department of Revenue.

The board of review submitted its "Board of Review Notes on Appeal." In support of its contention of the correct assessment the board of review submitted information on four comparable sales described as class 2-04 properties that are improved with 1-story or 1.6-story dwellings of masonry exterior construction ranging in size from 4,175 to 4,866 square feet of living area. The dwellings are from 25 to 65 years old. The board of review described the subject to be in average condition and the comparables to be in average condition. One comparable has a crawl space foundation and three comparables each have a full or partial basement, two of which have finished area. Each comparable has central air conditioning, one or two fireplaces and from a 2-car to a 3.5-car garage. The comparables have sites that range in size from 20,199 to 52,869 square feet of land area, where comparable #1 is located within the subject's subarea, comparable #2 is located within the same block as the subject and comparable #3 is located approximately ¼ of a mile from the subject. The sales occurred from March 2021 to October 2023 for prices ranging from \$1,679,000 to \$4,000,000 or from \$400.91 to \$822.03

for per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In a rebuttal letter dated October 18, 2024, the appellant's attorney contends the appellant has a 2022 appeal pending before the Illinois Property Tax Appeal Board. Counsel requested a rollover of a 2022 decision reducing the subject's assessment which is mandated by law pursuant to Section 16-185 of the Property Tax Code. A copy of the assessor's website printout disclosed the subject property received the homeowner's exemption for tax year 2023.

The Property Tax Appeal Board takes judicial notice that the subject property was the subject matter of an appeal before the Board the prior tax year under Docket No. 22-22362 in which a decision was issued on August 19, 2025. In that appeal the Board determined that no change in the subject's assessment was warranted based on the evidence in the record.

### **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 an initial matter, the Board finds that in rebuttal on October 18, 2024, the appellant prematurely requested a rollover of the subject's purported "reduction" in the 2022 assessment based on Section 16-185 of the Property Tax Code. However, the Property Tax Appeal Board finds the subject property does not qualify for a rollover, since the Board determined on August 19, 2025 that no change in the subject's assessment for tax year 2022 was warranted based on the evidence in the record as depicted in the Property Tax Appeal Board decision for Docket No. 22-22362.

The appellant submitted an appraisal of the subject property, and the board of review submitted four comparable sales to support their respective positions before the Board.

The Board gives less weight to the value conclusion in the appellant's appraisal as the appraiser chose comparables #3 and #5 which are considerably larger dwellings with younger ages when compared to the subject dwelling and/or lacks a basement foundation. Additionally, the Board finds it problematic that the appraiser made no adjustments for differences in site size, although two of the comparables have considerably smaller site sizes and one comparable has a considerably larger site size when compared to the subject. These factors undermine the credibility of the appellant's appraiser's conclusion of value. However, the Board will analyze the raw sales data contained in this report.

The record contains nine comparable sales for the Board's consideration. The Board has given less weight to the appellant's appraisal comparables #2, #3 and #5, as well as board of review comparables #1, #2 and #4, which differ from the subject dwelling in size and/or age and/or have sale dates that occurred in 2020 or 2021, which are less proximate to the lien date at issue than

are other comparables in the record. Additionally, the appellant's comparable #3 and board of review comparable #4, each lack a basement foundation, a feature of the subject.

The Board finds the best evidence of market value in the record to be the appellant's appraisal comparables #1 and #4, along with board of review comparable #3. These three comparables sold more proximate in time to the January 1, 2023 assessment date and are overall more similar to the subject in dwelling size, foundation type and age but have varying degrees of similarity when compared to the subject in site size, design and other features, suggesting adjustments would be required to make the comparables more equivalent to the subject. The properties sold from January 2022 to January 2023 for prices ranging from \$1,250,000 to \$1,850,000 or from \$284.28 to \$443.11 per square foot of living area, including land. The subject's assessment reflects an estimated market value of \$1,625,890 or \$357.50 per square foot of living area, including land, is within the range established by the best comparable sales in the record. After considering adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Based on this evidence, the Board finds 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



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: \_\_\_\_\_

November 25, 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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