



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

APPELLANT: Superior Real Estate Investment, Inc
DOCKET NO.: 23-22456.001-R-1
PARCEL NO.: 05-07-203-006-0000

The parties of record before the Property Tax Appeal Board are Superior Real Estate Investment, Inc, the appellant, by attorney Michael R. O'Malley, 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: \$30,492
IMPR.: \$70,508
TOTAL: \$101,000

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 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 frame exterior construction with 3,028 square feet of living area.¹ The dwelling is approximately 103 years old. Features of the home include an unfinished basement and a 2-car garage. The property has an approximately 13,860 square foot site and is located in Glencoe, New Trier 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 in the same assessment neighborhood code as the subject property. The

¹ The Board finds the best description of the subject property was found in the grid analysis submitted by the board of review and not refuted by the appellant.

Property Index Numbers (PINs) of the appellant's comparables begin with 05-08 or 05-17, indicating the comparables are located in sections 08 or 17, whereas the subject PIN begins with 05-07, indicating the subject is located in section 07. The comparables are improved with 2-story class 2-06 dwellings of frame, masonry or stucco exterior construction ranging in size from 2,911 to 3,280 square feet of living area. The homes range from 68 to 111 years old. Each comparable has a basement, four of which have finished area. Each dwelling has one or two fireplaces and a 2-car garage. Two homes have central air conditioning. The comparables have improvement assessments ranging from \$53,784 to \$58,500 or from \$17.67 to \$18.59 per square foot of living area.

The appellant also submitted evidence documenting the subject property sold in an arm's length transaction on July 8, 2022 for a price of \$965,000. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$54,504 or \$18.00 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 \$101,000. The subject property has an improvement assessment of \$70,508 or \$23.29 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on three equity comparables located in the same assessment neighborhood code and within $\frac{1}{4}$ of a mile from the subject property.² The comparables are improved with 2-story class 2-06 dwellings of frame, masonry or stucco exterior construction ranging in size from 2,368 to 3,253 square feet of living area. The homes are from 68 to 98 years old. Two comparables have a basement, with one having finished area and one comparable has a crawl space foundation. One dwelling has central air conditioning, each home has one fireplace and two properties have a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$58,276 to \$79,276 or from \$24.37 to \$24.96 per square foot of living area.

The board of review's grid analysis also disclosed the subject property sold in July 2022 for a sale price of \$965,000. Based on this evidence, the board of review requested the subject's assessment be confirmed.

Conclusion of Law

The appellant 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.

² The Property Index Numbers (PINs) of the board of review's comparables begin with 05-07, indicating the comparables are located in same section as the subject property.

Initially, the Board finds the appellant indicated assessment inequity as the basis of this appeal and did not check recent sale as an alternate basis of the appeal. Pursuant to Section 1910.50(a) of the rules of the Property Tax Appeal Board, each appeal shall be limited to the grounds listed in the petition filed with the Board. (86 Ill.Admin.Code §1910.50(a)) As a result, no weight is given to the July 2022 sale of the subject property.

The parties submitted eight equity comparables for the Board's consideration. The Board gives reduced weight to the appellant's comparables which are located in a different section of the township than the subject and other properties in the record and/or differ from the subject in age. The Board gives less weight to board of review comparable #2 which differs from the subject in age, foundation type, garage amenity and/or dwelling size.

The Board finds the best evidence of assessment equity to be board of review comparables #1 and #3 which are more similar to the subject in location, age, design, dwelling size and some features. These comparables have improvement assessments of \$62,893 and \$79,276 or \$24.37 and \$24.96 per square foot of living area. The subject's improvement assessment of \$70,508 or \$23.29 per square foot of living area falls below the two best comparables in this record. After considering adjustments to the best comparables for differences from the subject, the Board finds 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 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: _____

July 21, 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

Superior Real Estate Investment, Inc, by attorney:
Michael R. O'Malley
Schmidt Salzman & Moran, Ltd.
111 West Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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