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

APPELLANT: Joseph & Pia Cacciatore
DOCKET NO.: 23-25403.001-R-1
PARCEL NO.: 05-29-203-001-0000

The parties of record before the Property Tax Appeal Board are Joseph & Pia Cacciatore, the appellant(s), by attorney Paul K. Lee, of The Law Office of Paul K. Lee in Chicago; the Cook County Board of Review; and Avoca SD #37 and New Trier HSD #203, the intervenors, by attorney Scott L. Ginsburg and Danielle McNamara of Robbins Schwartz in Chicago.

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:

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| **LAND:** | $73,729 |
| **IMPR.:** | $128,271 |
| **TOTAL:** | $202,000 |

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 52,664 square foot parcel of land improved with an approximately 97-year-old, two-story, masonry, 6,196 square foot, single-family dwelling with a 1,374 square foot coach house. The property is located in Winnetka, New Trier Township, Cook County and is classified as a class 2 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 which estimated the subject's market value as of January 1, 2022, of $2,020,000. The appraiser inspected the subject on September 19, 2022. The appraiser utilized the sales comparison approach to value to estimate the subject's market value. The appraiser opined the highest and best use of the property as improved is its current residential use.

Under the sales comparison approach, the appraiser analyzed five sales in arriving at the estimate of value. The sales properties are described as two-story, frame or masonry, single-family home. They range in age from 25 to 116 years and in size from 4,584 to 6,880 square feet of building area. They sold from April 2021 to May 2022 for prices ranging from $1,570,000 to $2,339,000 or from $300.88 to $454.35 per square foot of building area. After making adjustments for pertinent factors, the appraiser opined a value under the sales comparison approach of $310.00 per square foot of living area for the main house and $75.00 per square foot of building area for the coach house for a total estimated value for the subject of $2,020,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the subject's assessment of $270,933 which reflects a market value of $2,709,330 using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of the current assessment, the board of review submitted four sales comparables. These comparables are described as two-story, masonry or frame and masonry, single-family dwellings. They range in age from 25 to 96 years and in size from 6,553 to 13,321 square feet of building area. They sold from February 2022 to November 2023 for prices ranging from $4,407,266 to $5,475,000 or from $411.01 to $755.23 per square foot of building area.

The intervenor submitted seven sales comparables. These comparables are described as two or three-story, masonry or stone, single-family dwellings. They range in age from 93 to 104 years and in size from 6,235 to 8,109 square feet of building area. They sold from September 2020 to September 2023 for prices ranging from $2,775,000 to $4,188,520 or from $376.347 to $647.68 per square foot of building area. The intervenor also submitted a printout from the assessor's website showing a residential permit issued in June 2020 for $145,000 for 1 car addition and interior remodel.

In rebuttal, the intervenor argued that the appellant's appraisal's comparables are not similar to the subject property as they are all significantly smaller in land and improvement size than the subject and do not have coach houses. The intervenor also asserted differences in the number of bedrooms and baths.

A hearing was held on June 10, 2026. At this hearing, the appellant called their witness, Ibi Aboyade-Cole. Ms. Cole testified that she has been a general real estate appraiser for 23 years and has her MAI and AI-GRS Designations. She testified she performs commercial and residential appraisals for small to large properties and that she has performed over 1,000 residential appraisals. Ms. Cole stated that she has testified before the Illinois Property Tax Appeal Board previously. Ms. Cole was accepted as an expert on the valuation of residential properties without objection.

Cole testified she valued the property for ad valorum tax purposes as of January 1, 2022. She gave the definition for fair market value and described the subject property. She opined that the subject is highly unique in that it has a coach house and is not upgraded. Cole opined that the subject is ranked at the bottom of the market based on its physical characteristics, age, and quality of construction.

Cole testified that the leading approach, which was utilized in this appraisal, is the sale comparison approach, but that you can implement other approaches to value into this approach. Cole testified that the sales comparison approach measures the attitudes of buyers and sellers in the market. In using this approach, Cole testified that you consider sales that are similar to the subject and equalize those properties by way of adjustments. As to the subject's comparables, Cole testified that she was unable to find any comparables that had coach houses so only the subject's main building was compared to the comparable properties. She opined that the coach house is not as valuable as the main building but does add some value to the overall site. She testified that the coach house cannot be sold as a separate entity and can't be considered as the same value. She testified that she made downward adjustments to the comparables to account for the subject's lack of upgrades. She also opined that the subject's land is super adequate. Cole testified to the comparables, and adjustments made. She opined a value for the main house of $310.00 per square foot of building area or $1,920,000.

Cole testified that she handled the coach house separately as contributory value. She testified that she referenced Marshall and Swift for the variances in cost to construct between guest houses and pool houses to value the coach house. She testified that the average cost was between $80.00 and $100.00 per square foot of building area. She testified that there are also local and current multipliers and depreciation to be considered. She finalized a contributory value for the coach house of $75.00 per square foot of building area. She concluded that she found a value for the subject of $2,020,000.

On cross examination, Cole believed that she appraised the subject previously for a value of $1,820,000. She testified that the adjustment for market condition was not explicitly reported. She testified that she likely did consider a ranking adjustment for sales closer to the lien date and then sales from 2021 as inferior. She opined that, because the appraisal is a summary report, there is no obligation to include every singe adjustment in the report; while its not explicitly reported that doesn't mean it wasn't considered. Cole testified that she did not make qualitative adjustments to the comparables but made qualitative adjustments in ranking them. She acknowledged that she used the sales comparison approach in the appraisal and that she valued the coach house using a cost-based methodology. She acknowledged that a permit was issued in 2020 for a garage addition and interior remodeling. She opined that the garage and remodeling were super adequacies that did not contribute to the market value. She opined that the sales comparison approach includes methodologies of all the other approaches to value in order to make adjustments.

On redirect, Cole confirmed that she beliefs that the sales comparison approach is the strongest basis of valuing residential property. She testified that she needs the market data to use her experience of understanding comparables to make the adjustments.

At hearing the board of review rested on the evidence previously submitted. The intervenor argued that the seven comparables submitted by the intervenor that are all located in Winnetka and show sales prices range from $455 to $647 per square foot of building area. She argued that these sales support the subject's current assessment or even warrant an increase in the assessment. She asserted that the comparables within the appraisal are all materially smaller than the subject and omit the value of features present in the subject. She argued two these comparables had sale prices per square foot higher than that estimated for the subject. She argued that although the appellant values the coach house using a general reference to Marshall and Swift, no cost approach was performed for this appraisal.

## 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 best evidence of market value to be the appraisal submitted by the appellant. The appellant's appraiser utilized the sales comparison approach to value in determining the subject's market value. The appraiser reviewed the comparables for pertinent factors which included condition of sale and market conditions and found a value for the subject’s main house based on this analysis and added the contributory value of the coach house in determining the value of the whole property. The Board finds the market value of the subject of $2,020,000 as of January 1 of the lien year. The assessment reflects a market value above this value. Since market value has been established the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10% shall apply.

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

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| Member | Member |
| Member | Member |

DISSENTING:

C E R T I F I C A T I O N

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.

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