

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Dennis Beck
DOCKET NO.: 24-21721.001-R-1
PARCEL NO.: 05-21-410-014-0000

The parties of record before the Property Tax Appeal Board are Dennis Beck, the appellant, by attorney Robert Rosenfeld, of Robert H. Rosenfeld & Associates, LLC in Northbrook; 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: \$31,350 **IMPR.:** \$45,650 **TOTAL:** \$77,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely appealed a Cook County Board of Review decision pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 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 2,030 square feet, two-story residence of frame and masonry construction on a 9,500 square feet parcel in Winnetka, New Trier Township, Cook County. The 103-year-old home includes 2.5 bathrooms, a fireplace, and a two-car garage and is designated a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

Contesting the subject improvement assessment as inequitable, the appellant requested the assessment be lowered from the original \$22.49 per living square foot to \$20.22 per square foot. To show assessment inequity, the appellant provided details about four class 2-05 properties within a mile of the subject whose improvement assessments spanned \$19.34 to \$20.63 per square foot of living area. Each comparable contained a full basement, a garage, frame construction, and included no air conditioning.

In its "Board of Review Notes on Appeal," the county board of review asserted the \$22.49 per improvement square foot, or \$45,650 for the subject improvement, was correctly assessed. In defense of its \$77,000 total subject assessment, the board of review presented three 100-or-so-year-old properties with improvement assessments from \$23.60 to \$29.12 per square foot as equity comparables for the subject property.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. The Illinois Constitution requires that real estate taxes "be levied uniformly by valuation ascertained as the General Assembly shall provide by law." Ill. Const., art. IX, § 4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). Yet this uniformity provision of the Illinois Constitution does not require absolute equality in taxation; instead, a reasonable degree of uniformity in the taxing authority's assessments suffices. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

When the ground for appeal is unequal treatment in the assessment, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e); Walsh, 181 Ill. 2d at 234 (1998). Proof of unequal treatment in the assessment process should consist of assessment documentation for the year in question of at least 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.

The Board finds the best evidence of assessment equity to be appellant comparables #2 and #4 and board of review comparables #1 and #3. With one fewer full bathroom and 212 less square feet of living space, respectively, appellant comparables #2 and #4 were both inferior to the subject in minor respects and comprise the low end of the equitable assessment range. Meanwhile, board of review comparables #1 and #3 each had one fewer half bathroom than the subject, but more living space. Given this record, the subject improvement would be equitably assessed anywhere between \$20.41 and \$25.99 per square foot of living space. Because the subject's improvement assessment of \$22.49 per square foot falls within this range, the Board concludes the appellant did not demonstrate with clear and convincing evidence that the improvement assessment was inequitable and a reduction in the subject assessment is therefore 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

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: September 16, 2025

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Clerk of the Property Tax Appeal Board

Section 16-185 of the Property Tax Code provides in part:

IMPORTANT NOTICE

"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 <u>PETITION AND EVIDENCE</u> 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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APPELLANT

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