



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

APPELLANT: Bennett & Lauren Sher
DOCKET NO.: 24-22618.001-R-1
PARCEL NO.: 05-27-421-020-0000

The parties of record before the Property Tax Appeal Board are Bennett & Lauren Sher, the appellant(s), by attorney Michael Elliott, of Elliott & Associates Attorneys, PLLC in Des Plaines; and the Cook County Board of Review.

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:

LAND: \$18,667
IMPR.: \$82,033
TOTAL: \$100,700

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 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 two-story dwelling of frame construction, approximately eighty-two years-old, with 2,774 square feet of living area on a 6,788 square foot lot in Wilmette, New Trier Township, Cook County. The subject is classified as 2-06 under the Cook County Real Property Assessment Classification Ordinance. Features of the home include two full bathrooms and a full basement.

The appellant contends overvaluation as the basis of appeal. In support of its market value argument, the appellant completed Section IV – Recent Sale Data in its Residential Appeal Form indicating the subject property was purchased on March 17, 2023, for \$1,007,000 or \$363.01 per square foot of living area. The appellant indicates that the sale did not occur between family members, was sold through a broker and was listed on the multiple listing service for a period of

four days. The appellant submitted a copy of the settlement statement which shows commissions paid to seller's and buyer's brokers and fees paid to seller's and buyer's attorneys.

The appellant also contends that a 9.1% equalization factor should be applied to Class 2 properties in Cook County rather than the 10% applied under the Cook County Real Estate Classification Ordinance. In support of this contention, the appellant submitted a press release dated May 20, 2024, from the Illinois Department of Revenue announcing the final 2023 Cook County tax equalization factor with a three-year average for Class 2 properties of 9.02%. The appellant also submitted two sales ratio studies of Cook County residential assessments authored by Professor Daniel McMillen of the University of Illinois Chicago Department of Real Estate.

The board of review submitted its "Board of Review Notes on Appeal" stating the total valuation assessment for the subject property as \$111,984 with an improvement assessment of \$93,317. The valuation assessment reflects a market value of \$1,119,840 when applying the 10% Cook County Real Estate Classification Ordinance assessment for class two properties, or \$403.69 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four sales comparables with sales taking place from April 20, 2022, to December 26, 2024, for prices ranging from \$1,550,000 to \$2,408,796 or \$587.12 to \$802.13 per square foot of living area. The comparable properties are two-story buildings of frame or stucco construction, ranging in age from 113 to 117 years-old and ranging in size from 2,640 to 3,595 square feet of living area. The board of review reports that three of its sales comparables are within one-quarter mile of the subject property.

Conclusion of Law

The appellant contends that 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 proven by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). Proof of market value may consist of a recent sale or appraisal of the subject property, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant *did meet* this burden of proof.

The Board finds that the best evidence of market value to be the March 17, 2023, sale of the subject property for a price of \$1,007,000. The board of review has not refuted the arms-length nature of the sale which did not occur between family members, was transacted through a broker with each party represented by their own attorney and was advertised for sale with the multiple listing service. The Board sees no merit in the appellant's assessment ratio argument as it is unsupported by citation to any legal authority. Based on this record the Board finds that the subject property had a market value of \$1,007,000. The Board finds that the market value established by the purchase price is below the assessment and therefore a reduction in the subject's assessment *is* appropriate.

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: _____

September 15, 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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