



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

APPELLANT: Kris Fassler
DOCKET NO.: 19-49990.001-R-1
PARCEL NO.: 27-30-207-009-0000

The parties of record before the Property Tax Appeal Board are Kris Fassler, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge, 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: \$ 6,751
IMPR.: \$45,890
TOTAL: \$52,641

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 2019 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 and masonry exterior construction with 3,929 square feet of living area. The dwelling is approximately 19 years old. Features include a basement,¹ central air conditioning, a fireplace and a three-car garage. The property has an 11,252 square foot site and is located in Orland Park, Orland Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of the argument, the appellant submitted information on four comparable sales and a comparable sales analysis. The properties are located within the same neighborhood code as the subject and one is on the same street as the subject. The comparables have lots ranging in size from 11,460 to 19,200 square

¹ The appellant reports the home to have a recreation room while the board of review reports the basement is unfinished.

feet of land area and are improved with similar class 2-08 dwellings of masonry or frame or masonry exterior construction. The comparables range in size from 3,826 to 4,999 square feet of living area and were 19 to 23 years old. Each comparable has a full unfinished basement, central air conditioning, a fireplace and either a two-and-one-half or a three-car garage. The comparables sold from April 2017 to September 2019 for prices ranging from \$430,000 to \$560,000 or from \$109.11 to \$126.76 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$45,755 which would reflect a total market value of \$457,550 or \$116.45 per square foot of living area, land included, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$52,641. The subject's assessment reflects a market value of \$526,410 or \$133.98 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%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales that are located within the same neighborhood code as the subject. The comparables have lots ranging in size from 10,419 to 16,287 square feet of land area and are improved with similar two-story dwellings of masonry or frame and masonry exterior construction. The comparables range in size from 3,820 to 3,934 square feet of living area and range in age from 1 to 16 years old. Each comparable has a full basement, one of which has a formal recreation room. Each comparable has central air conditioning, a fireplace and either a two-car or a three-car garage. The comparables sold from February to November 2019 for prices ranging from \$562,500 to \$715,000 or from \$144.71 to \$182.91 per square foot of living area, including land.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 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.

The parties submitted a total of eight comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparable #3 due to its substantially larger dwelling size when compared to the subject. Reduced weight was given to appellant's comparable #4 as it sold in April 2017, a date more remote in time from the lien date of January 1, 2019 given other available sales in the record. The Board has given reduced weight to board of review comparables #2 and #4 due to their newer dates of construction when compared to the 19 year old subject dwelling.

The Board finds the best evidence of market value to be the appellant's comparable sales #1 and #2 along with board of review comparable sales #1 and #3. These most similar comparables are similar to the subject in age, location, dwelling size and several features. These properties sold from June 2018 to November 2019 for prices ranging from \$485,000 to \$715,000 or from \$117.92 to \$147.25 per square foot of living area, including land. The subject's assessment reflects a market value of \$526,410 or \$133.98 per square foot of living area, including land, which is within the range of the best comparable sales in this record in terms of both overall value and on a per-square-foot basis. Based on this evidence and after considering adjustments to the best comparable sales for differences when compared to the subject, 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:

May 16, 2023



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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