



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

APPELLANT: Vishal Patel  
DOCKET NO.: 20-30663.001-R-1  
PARCEL NO.: 17-18-107-015-0000

The parties of record before the Property Tax Appeal Board are Vishal Patel, the appellant, by Adam E. Bossov, of the Law Offices of Adam E. Bossov, P.C., 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 **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:** \$8,996  
**IMPR.:** \$29,504  
**TOTAL:** \$38,500

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 2020 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 exterior construction with approximately 1,468 square feet of living area.<sup>1</sup> The dwelling is approximately 19 years old with a reported effective age of 7 years old. Features of the home include 3 bedrooms, a full finished basement, 1½ bathrooms, central air conditioning, one fireplace<sup>2</sup> and a two-car garage. The property has an approximately 2,646 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-07 property under the Cook County Real Property Assessment Classification Ordinance.

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<sup>1</sup> The appraisal report includes a schematic drawing of each portion of the improvements to support the dwelling size of 1,468 square feet. In contrast, the board of review provided no evidence to support the reported dwelling size of 1,545 square feet. The Board finds the only record evidence support a dwelling size of 1,468 square feet.

<sup>2</sup> The assessing officials do not report a fireplace. There is a photograph of a fireplace in a bedroom in the appraisal. The Board finds the appraisal contains the best evidence that a fireplace is an amenity of the property.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal of the subject property prepared for the client Guaranteed Rate, Inc., based on fee simple property rights for a refinance transaction. The intended use of the report was solely for the purpose of assisting the client in underwriting a real estate loan on the subject property. Using the sales comparison approach to value, Kurt Wessel, a Certified Residential Real Estate Appraiser, estimated the subject property had a market value of \$385,000 as of May 18, 2020.

The appraiser analyzed four sales and one active listing located from .22 to .81 of a mile from the subject. The parcels are each improved with two-story Traditional dwelling ranging in age from 13 to 130 years old. The homes range in size from 1,300 to 1,686 square feet of living area. Each comparable has a basement with finished area, 2 to 3 bathrooms, central air conditioning and a one-car or a two-car garage. One comparable has a fireplace. The comparables feature from 2 to 4 bedrooms. Four properties sold from August 2019 to April 2020 for prices ranging from \$365,000 to \$489,000 and with the active listing presenting an asking price of \$489,000 which reflect prices and asking prices from \$216.49 to \$339.11 per square foot of living area, including land. Next, the appraiser made adjustments to the comparables for concessions along with additional adjustments for differences in bathroom count, dwelling size, basement finish, bedroom count (functional utility), garage capacity and/or other features when compared to the subject. As part of the Supplemental Addendum, the appraiser acknowledged that several of the comparable properties differ from the subject in age, but Wessel determined the effective age of the comparables were considered to be generally similar to the subject. Through this adjustment process, Wessel arrived at adjusted sales prices ranging from \$379,280 to \$430,400. Based on the foregoing evidence, the appellant requested an assessment reflective of the final opinion of value as determined by the appraiser.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$44,178. The subject's assessment reflects a market value of \$441,780, 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 three comparables located in the same neighborhood code as the subject. The grid analysis presents only assessment information for each comparable. There is no market value evidence (i.e., recent sales prices) presented in response to the appellant's overvaluation appeal.

In rebuttal, counsel for the appellant noted the lack of market value evidence and requested that the board of review be found in default with a decision rendered in favor of the appellant.

### **Conclusion of Law**

As an initial matter, the Property Tax Appeal Board denies the appellant's request to find the board of review in default. The board of review timely complied with the Board's procedural rules and requirement to file evidence in this appeal along with its Board of Review – Notes on Appeal (86 Ill.Admin.Code §1910.40). Although evidence was filed, the appellant is correct that

the evidence submitted by the board of review is not responsive to the overvaluation argument. Thus, the Board will issue a decision based on the record evidence.

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 appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best and only evidence of market value to be the appraisal submitted by the appellant setting forth an opinion of value of \$385,000. The report utilized comparables in relatively close proximity to the subject and adjustments were applied to the comparables for differences. The board of review failed to address the appellant's appraisal report and failed to present any comparable sales or other market value evidence in support of the subject's assessment. The subject's assessment reflects a market value of \$441,780, including land, which is above the appraised value conclusion of \$385,000.

On this limited record, the Board finds the subject property had a market value of \$385,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2).

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.

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Chairman

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Member

Member

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Member

Member

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Member

Member

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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: March 18, 2025

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Clerk of the Property Tax Appeal Board

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

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