



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

APPELLANT: Mark Reiter
DOCKET NO.: 21-39171.001-R-1 through 21-39171.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Mark Reiter, the appellant(s), by attorney Daniel J. Heywood, of Maher, Brannigan & Heywood, P.C. in Orland Park; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-39171.001-R-1	25-06-413-026-0000	5,463	11,845	\$17,308
21-39171.002-R-1	25-06-413-027-0000	5,042	0	\$5,042

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 2021 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 two parcels and is a 113-year-old, two-story building of frame construction with 2,518 square feet of building area. The property has a 9,350-square-foot site and is located in Chicago, Lake Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation established by a recent sale. In support of the market value argument, the appellant submitted a settlement statement disclosing the subject property sold on May 29, 2020, for a price of \$223,500 or \$88.76 per square foot of living area, including land. The settlement statement listed commissions to realty companies. The petition disclosed the sale was not between related parties, that a realtor was involved in the sale, the property was advertised for sale for 196 days on the multiple listing service, and that the sale was

not due to a foreclosure or contact for deed. The petition disclosed that the subject is an owner-occupied residence.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the assessment for one parcel. The subject's total assessment is \$49,219 with an improvement assessment of \$37,384 or \$10.45 per square foot of living area. The total assessment reflects a market value of \$492,190 or \$195.47 per square foot of living area, including land, 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 also submitted three sales comparables. The sold from May to September 2021 for prices ranging from \$675,000 to \$1,035,000 or \$187.40 to \$403.04 per square foot of living area. The board of review also listed the sale of the subject in September 2020 for \$172,550. The notes on appeal disclose that the "MLS indicates sold as is."

In rebuttal, the appellant submitted a letter asserting that the best evidence presented was the appellant's sales evidence and that the sales submitted by the board of review have not been adjusted for differences with the subject property.

The matter was set for a hearing before an Administrative Law Judge on March 5, 2025.

At the hearing the appellant argued the board of review failed to produce any evidence of market value for the subject property and instead made a market value and a uniformity argument. The appellant further argued that the comparables submitted by the board of review have not been adjusted relative to the subject property. The appellant also noted that the board of review omitted the property identification numbers (PINs) for the subject property. The board of review argued that the sale was not an arm's length transaction given the sale price of the property.

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 purchase of the subject property in May 2020 for a price of \$223,500. The appellant submitted evidence of the sale of the subject, and the board of review did not show that the sale was not at arm's-length and listed the sale in their evidence. In addition, the settlement statement includes realty commissions,. Based on this record, the Board finds the subject property had a market value of \$223,500 as of the lien date. Since market value has been determined, the level of assessment of 10% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance shall apply, and a reduction in the subject's assessment is warranted.

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

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: _____

July 15, 2025

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

AGENCY

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