



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

APPELLANT: Bing Kwan Raymon Hung Trust
DOCKET NO.: 21-57760.001-R-1
PARCEL NO.: 07-16-319-024-0000

The parties of record before the Property Tax Appeal Board are Bing Kwan Raymon Hung Trust, 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: \$4,058
IMPR.: \$23,625
TOTAL: \$27,683

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 a 43-year-old, multi-level, single-family dwelling of frame construction with 1,476 square feet of living area. Features of the home include a partial basement with a recreation room and a two-car garage. The property has a 5,798 square foot site and is located in Hoffman Estates, Schaumburg Township, Cook County. The subject is classified as a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal that estimated that the subject property had a market value of \$245,000 as of January 1, 2019. The appraisal used the sales comparison approach. The appraiser relied on three suggested sales comparables of dwellings within 0.72-miles of the subject property for amounts ranging from \$243,000 to \$245,000, or between \$150.84 and

\$185.21 per square foot of living area, land included in the sale prices. The appraiser adjusted the sales prices to account for differences between the comparables and the subject. After applying the adjustments, the appraiser determined that the subject's market value was \$245,000.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$27,683. The subject's assessment reflects a market value of \$276,830, or \$187.55 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of the assessment, the board of review submitted information about three suggested sale comparables. The suggested sale comparable sold between October 2020 to November 2021, for amounts ranging from \$325,000 to \$425,000, or between \$220.19 and \$287.94 per square foot of living area, land included in the sales prices. The comparables were located within a quarter mile of the subject property, while two were within a block.

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 taxpayer must prove the value of the property 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 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 Board gives little weight to the appraisal submitted by the appellant for several reasons. First, the appraisal estimates the value of the property as of January 1, 2019, two years before the applicable valuation date of January 1, 2021. See 35 ILCS 200/9-155. Second, all three of the sales comparable relied on in the appraisal were sold more than three years before the applicable valuation date. The suggested comparable properties relied on by the appraiser were too remote in time from the January 1, 2021, assessment date of the subject property. Accordingly, this Board gives little weight to the value conclusion contained in the appraisal due to its reliance on outdated sales comparables that fail to provide an accurate range regarding the subject's market valuation for the current lien year.

The Board finds that the best evidence of market value is the board of review's sales comparables #1, #2 and #3. Like the subject property, these comparables are multi-level, single-family dwellings of frame construction with similar living areas, a partial basement with a recreation room, a two-car garage, and locations within a quarter mile of the subject property.

The suggested sale comparable sold between October 2020 to November 2021, for amounts ranging \$220.19 to \$287.94 per square foot of living area, land included in the sales prices. The subject property's assessment reflects a market value of \$276,830, land included, or \$187.55 per square foot of living area, which is below the range established by the best comparables in the record. It is the appellant's ultimate burden of showing overvaluation by preponderance of the

evidence. The appellant failed to do so, therefore, a reduction in the subject's assessment on this basis 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

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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