



FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Frank Pellicori
DOCKET NO.: 22-32185.001-R-1
PARCEL NO.: 02-20-201-010-0000

The parties of record before the Property Tax Appeal Board are Frank Pellicori, the appellant, by Salvador Lopez, attorney-at-law of Robson & Lopez LLC 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 **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:	\$14,727
IMPR.:	\$60,305
TOTAL:	\$75,032

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 2022 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 is improved with a two-story dwelling of masonry exterior construction containing 4,572 square feet of living area. The dwelling is approximately 8 years old. Features of the property include a full basement with a formal recreation room, central air conditioning, three fireplaces, 3½ bathrooms, and a 3-car garage. The property has a 49,092 square foot site located in Inverness, Palatine 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 inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables composed of class 2-08 properties improved with two-story dwellings of masonry exterior construction that range in size from 3,821 to 4,975 square feet of living area. The homes range in age from 41 to 54 years old. Each property has a full basement with two having

finished area, central air conditioning, one or two fireplaces, four bathrooms, and a 2.5-car or 3-car garage. These properties have the same assessment neighborhood code as the subject and are located from 1 to 2 miles from the subject property. Their improvement assessments range from \$39,500 to \$57,032 or from \$9.85 to \$11.50 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$48,966.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$75,032. The subject property has an improvement assessment of \$60,305 or \$13.19 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables composed of class 2-08 properties that are improved with two-story dwellings of frame, masonry, or frame and masonry exterior construction that range in size from 4,202 to 4,952 square feet of living area. The dwellings range in age from 36 to 55 years old. Each property has a full basement with one having finished area, central air conditioning, one or two fireplaces, three or four full bathrooms, one or two half bathrooms and a 2-car, 2.5-car, 3-car or 4-car garage. These properties have the same assessment neighborhood code as the subject and are located ¼ of a mile from the subject or in the "subarea." The comparables have improvement assessments that range from \$64,175 to \$66,614 or from \$12.96 to \$15.48 per square foot of living area.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 information on nine equity comparables with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparables #1 and #5 due to differences from the subject in dwelling size. The Board gives most weight to appellant's comparables #2, #3 and #4 as well as the board of review comparables. These remaining comparables range in size from 4,202 to 4,975 square feet of living area and in age from 36 to 55 years old. The comparables are improved with dwellings that are from approximately 28 to 47 years older than the subject dwelling indicating that each comparable would require an upward adjustment to make them more equivalent to the subject in age. These properties have varying degrees of similarity to the subject in features that would require adjustments to make them more equivalent to the subject property. Three comparables have more bathrooms than the subject and one comparable has a larger garage than the subject suggesting downward adjustments would be appropriate to make the comparables more equivalent to the subject for these differences. Conversely, each comparable has one or two fewer fireplaces than the subject and three comparables have smaller garages than the subject suggesting upward adjustments would be appropriate to make the comparables more equivalent to the subject for these differences. Additionally, five of the comparables have unfinished basements, unlike the subject property, indicating upward

adjustments would be appropriate. These comparables have improvement assessments that range from \$48,408 to \$66,614 or from \$10.09 to \$15.48 per square foot of living area. The subject's improvement assessment of \$60,305 or \$13.19 per square foot of living area falls within the range established by the best comparables in this record and is well supported after considering the appropriate adjustments to the comparables for differences from the subject in age and features. Based on this record the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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: _____

C E R T I F I C A T I O N

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:

January 20, 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

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