



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

APPELLANT: Dan Potocki  
DOCKET NO.: 22-37700.001-R-1  
PARCEL NO.: 12-16-207-032-0000

The parties of record before the Property Tax Appeal Board are Dan Potocki, 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:** \$5,692  
**IMPR.:** \$19,556  
**TOTAL:** \$25,248

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 consists of a one-story dwelling of masonry exterior construction with 961 square feet of living area. The dwelling is approximately 65 years old. Features of the dwelling include a full unfinished basement, one bathroom and a 2-car garage. The property has a 6,325 square foot site and is located in Schiller Park, Leyden Township, Cook County. The subject is classified as a class 2-02 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparables that have the same assessment neighborhood code and property classification code as the subject. The comparables have sites that range in size from 5,400 to 9,720 square feet of land area. The comparables are improved with one-story dwellings of masonry exterior construction ranging in size from 711 to 993 square

feet of living area. The dwellings are from 63 to 110 years old. The comparables each have a full unfinished basement and one bathroom. Comparable #4 has central air conditioning. Three comparables each have a 1.5-car or a 2-car garage. The properties sold from January 2019 to March 2021 for prices ranging from \$119,700 to \$198,000 or from \$142.12 to \$206.04 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's assessment be reduced to \$17,935, reflecting a market value of \$179,350 or \$186.63 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 \$25,248. The subject's assessment reflects a market value of \$252,480 or \$262.73 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 properties that have the same assessment neighborhood code and property classification code as the subject. The comparables are located approximately ¼ of a mile from the subject property. The comparables have sites that range in size from 5,500 to 6,700 square feet of land area. The comparables are improved with one-story dwellings of masonry exterior construction ranging in size from 968 to 988 square feet of living area. The dwellings are from 63 to 65 years old. The comparables each have a full basement, three of which are finished with a formal recreation room. Each comparable one full bathroom and either a 1-car or a 2-car garage. Two comparables have central air conditioning. The properties sold from April 2020 to October 2022 for prices ranging from \$236,000 to \$291,000 or from \$238.87 to \$300.31 per square foot of living area, land included. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The record contains eight comparable sales for the Board's consideration. The Board has given less weight to the appellant's comparables #1, #2 and #4, as well as board of review comparable #4, which have sale dates that occurred in 2019 or 2020, less proximate in time to the lien date at issue than other comparable sales in the record. Additionally, the appellant's comparable #1 differs from the subject dwelling in size and age.

The Board finds the best evidence of market value to be the appellant's comparable #3, along with board of review comparables #1, #2 and #3, which sold more proximate in time to the assessment date at issue. These four comparables have the same assessment neighborhood code and property classification code as the subject. The comparables are overall more similar to the

subject dwelling in size and age. However, board of review comparables #1 and #3 have basement finish and/or central air conditioning, unlike the subject, suggesting downward adjustments for these differences would be required to make these comparables more equivalent to the subject. Likewise, board of review comparable #3 has a smaller garage capacity, suggesting an upward adjustment for this difference would be necessary. Nevertheless, the comparables sold from March 2021 to October 2022 for prices ranging from \$196,000 to \$291,000 or from \$197.38 to \$300.31 per square foot of living area, including land. The subject's assessment reflects a market value of \$252,480 or \$262.73 per square foot of living area, including land, which falls within the range established by the best comparable sales in record both in terms of overall market value and on a price per square foot of living area basis. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not warranted based on overvaluation.

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:

August 19, 2025



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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