



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

APPELLANT: SHIRLEY CESSAC  
DOCKET NO.: 23-22875.001-R-1  
PARCEL NO.: 27-29-118-012-0000

The parties of record before the Property Tax Appeal Board are SHIRLEY CESSAC, the appellant(s); 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:** \$9,584  
**IMPR.:** \$38,416  
**TOTAL:** \$48,000

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

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 2023 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 an 18-year-old, two-story, single-family dwelling of masonry construction. Features of the home include three full and one-half bathroom, air conditioning, and a three-car garage. The property has a 12,779 square foot site located in Orland Park, Orland Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

Appellant contends overvaluation as the basis of the appeal. In support of its market value argument, appellant completed Section IV – Recent Sale Data in its Residential Appeal Form indicating the subject property was purchased on February 8, 2022, for \$565,000, the sale did not occur between family members and was advertised for sale online. In support of the recent sale, appellant submitted a copy of the real estate sales contract. Appellant also submitted copies of contractor estimates indicating quotes for demolition, renovation after removal of all rodent contaminated insulation, fixtures, systems, water damaged floor replacements, and sanitizing,

and replacement of the attic and basement insulation. Photographs were included in a report from Orkin revealing rodent droppings in the attic and basement insulation.

In further support of its market value argument, appellant submitted an appraisal estimating the subject property had a market value of \$60,000 as of January 1, 2023. The appraisal report indicates the appraiser visited the subject property and utilized the Sales Comparison Approach based on three sales comparables in determining the market value of the subject property. The comparable sales properties sold between December of 2023 and April of 2024 for prices ranging from \$602,500 to \$652,700, or between \$184.69 and \$193.62 per square foot of living area.

In addition, the appraisal report indicates the subject property sustained massive damage to the insulation in the attic and walls throughout the house by rodents. The appraisal report includes photographs of the subject property revealing the interior windows, fireplace, and some floors have been covered with either paper or plastic. The appraiser contends in his report that the subject property is not safe or sanitary because of the rodent infestation which was not disclosed at the time the subject property was purchased in 2022. The appraiser concludes that the best use of the subject property is vacant land, and the current improvement should be demolished.

Appellant also submitted a copy of the Board of Review's written decision letter reflecting a total assessment for the subject property of \$56,500. Based on its submitted evidence, appellant requests the subject property's total assessment be reduced to \$25,530.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$56,500 and an improvement assessment of \$46,916, or \$12.56 per square foot of living area. The subject's assessment reflects a market value of \$565,000, or \$151.23 per square foot of living area, including land, when applying the level of assessment for class 2 property of 10.00% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted information on four suggested comparables. Each were improved with a two-story residence of either masonry or frame and masonry construction. They ranged in living area square footage between 3,537 and 3,748 and in assessment between \$13.30 and \$15.59 per square foot of living area. The board of review's comparables sold between May of 2021 and August of 2022 for prices ranging from \$579,500 to \$675,000, or between \$159.20 and \$184.22 per square foot of living area.

In addition, the board of review included information in its grid analysis confirming the subject property sold in February of 2022 for \$565,000, or \$151.23 per square foot of living area. In its "Notes on Appeal," the board of review contends the appraisal report indicates a living area square footage of for subject property of 3,939, which results in a sales price of \$143.43 per square foot of living area.

Pursuant to proper notice provided to all parties, this matter proceeded to hearing on June 25, 2025. Appellant appeared pro se and stated that the subject property was purchased in 2022 but cannot be sold today for its assessed value. Appellant listed documents appellant previously

submitted into evidence including a contractor's estimate, inspection report, appraisal, closing statement, and MLS print-out. Appellant contends that the subject's rodent infestation and risk of carbon monoxide poisoning were not disclosed to appellant at the time of purchase and the cost to remedy the defects is estimated at \$667,000. Appellant contends the subject property's material defects and condition of the subject were not considered in its assessed value or at the time of the 2022 sale. Appellant stated that appellant continues to reside in the home with elderly parents because they cannot afford to live anywhere else. Appellant did not present any witnesses at hearing. The board of review representative rested on the evidence previously submitted.

### **Conclusion of Law**

The Board finds the subject property had 3,736 square feet of living area.

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

The Board does not find the appraisal submitted by the appellant persuasive. The Board takes judicial notice that the appraisal report was hearsay evidence because the appraiser was not present to testify. For proceedings before the Board, "[t]he procedure, to the extent that the Board considers practicable, shall eliminate formal rules of pleading, practice and evidence,...."35 ILCS 200/16180. However, in Novicki v. Department of Finance, 373 Ill.342,26 N. E.2d 130 (1940), the Supreme court of Illinois stated , [t]he rule against hearsay evidence, that a witness may testify only as to facts within his personal knowledge and not as to what someone else told him, is founded on the necessity of an opportunity for cross-examination, and is basic and not a technical rule of evidence." Novicki, 373 Ill. At 344. Thus, while the Board's rules allow for informal rules of evidence, the Board cannot repeal a basic rule of evidence under Supreme Court's holding in Novicki. Therefore, the Board finds that the appraisal is hearsay evidence for which no exception exists, and that the appraiser's adjustments shall not be considered as relevant evidence in this appeal.

The Board, however, will consider the three actual sale comparables contained in the appraisal without regard to the appraiser's adjustments or value conclusion as well as the board of review's four sale comparables. The Board finds the best evidence of market value to be *the appraisal report comparable #1 and the board of review's comparables #2, #3, and #4*. These properties sold in either 2021 or 2024 for prices ranging from \$159.20 to \$184.69 per square foot of living area, including land. The subject's current assessment of \$151.23 per square foot of living area reflects a market value below the market value established by the best comparables in this record.

However, the Board gives great weight to appellant's testimony regarding the rodent infestation and that appellant still resides in the subject property. The Board gives some weight to

appellant's submitted evidence consisting of submitted copies of contractor estimates indicating quotes for demolition, renovation after removal of all rodent contaminated insulation, fixtures, systems, water damaged floor replacements, and sanitizing, replacement of the attic and basement insulation and the photographs in a report from Orkin revealing rodent droppings in the attic and basement insulation. While the board determined the estimates to be excessive based on the photographs combined with appellant's testimony that appellant still resides in the home with appellant's family, the Board finds a partial reduction should be granted based on the totality of the evidence submitted by appellant. The Board finds the subject property's assessment reflects a market value above the best evidence of market value in the record. The Board finds the subject property had a market value of \$480,000 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.



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: \_\_\_\_\_

October 21, 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

SHIRLEY CESSAC  
17025 SHERIDANS TRL  
ORLAND PARK, IL 60467

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602