



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

APPELLANT: Jim Eiler  
DOCKET NO.: 23-49830.001-R-1  
PARCEL NO.: 24-09-314-022-0000

The parties of record before the Property Tax Appeal Board are Jim Eiler, the appellant, by attorney Marc M. Pekay, of the Law Offices of Marc M. Pekay, P.C. in Crystal Lake; 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:** \$3,756  
**IMPR.:** \$12,244  
**TOTAL:** \$16,000

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 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 a 1-story dwelling of masonry exterior construction with 1,330 square feet of living area. The home is approximately 66 years old. Features include a full basement and a 2-car garage. The property has a 6,260 square foot site and is located in Oak Lawn, Worth Township, Cook County. The subject is classified as a class 2-03 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 completed Section IV – Recent Sale Data of the appeal petition reporting that the subject property was purchased on October 5, 2023 for a price of \$160,000. The property was reported to have been purchased from Gustave Gloede and the parties to the transaction were not related. The property was sold by the owner and was advertised for sale for 30 days by a sign on the property and in the neighborhood. The subject was not sold by either a foreclosure action or using a contract for deed. The appellant's evidence included a partially signed copy of the

settlement statement which reiterated the seller, sale date, and sale price. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the subject's purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$26,000. The subject's assessment reflects a market value of \$260,000 or \$195.49 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%. In support of its contention of the correct assessment, the board of review submitted information on four comparable sales located within the subject's assessment neighborhood. The comparables have sites with either 6,260 or 6,750 square feet of land area. The comparables are improved with 1-story, class 2-03 dwellings of masonry exterior construction ranging in size from 1,221 to 1,368 square feet of living area. The homes are either 63 or 66 years old. Each comparable has a full or partial basement and a 1.5-car or a 2-car garage. One comparable has central air conditioning. The comparables sold from February 2021 to September 2023 for prices ranging from \$318,000 to \$348,900 or from \$238.92 to \$266.18 per square foot of living area, land included. The board of review's grid also reported the sale of the subject in November 2023 for a price of \$160,000 but did not provide additional details related to this sale.

### **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 met this burden of proof and a reduction in the subject's assessment is warranted.

This record contains the sale of the subject and four suggested comparable sales submitted by the board of review for the Board's consideration. The Board finds the best evidence of market value to be the purchase of the subject property in October/November 2023 for a price of \$160,000. The Illinois Supreme Court held that a contemporaneous sale between parties dealing at arm's length is not only relevant to the question of fair cash value but is practically conclusive on the issue of whether an assessment is reflective of market value. Korzen v. Belt Railway Co. of Chicago, 37 Ill. 2d 158, 161, 226 N.E.2d 265, 267 (Ill. 1967). The appellant provided evidence demonstrating the sale had elements of an arm's length transaction. The appellant disclosed the parties to the transaction were not related and the property had been advertised by a sign on the property and in the neighborhood. The appellant provided a copy of the settlement statement to document the subject's sale. The Board did not present any substantive evidence to challenge or to refute the arm's length nature of the subject's sale transaction. Furthermore, the Board finds the board of review's comparable sales do not overcome the arm's length sale of the subject property. The Board finds the subject's purchase price of \$160,000 falls below the market value, as reflected by the subject's assessment, of \$260,000. Therefore, based on this record, the Board finds a reduction in the subject's assessment to reflect its sale price is warranted based upon the Cook County Real Property Assessment Ordinance level of assessment for Class 2 property of 10% and procedural rule 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:

April 21, 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

AGENCY

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