



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

APPELLANT: Irfan Sheikh
DOCKET NO.: 14-27515.001-R-1 through 14-27515.006-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Irfan Sheikh, the appellant(s), by attorney Edward P. Larkin, Attorney at Law in Des Plaines; 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
14-27515.001-R-1	20-03-108-033-1001	1,331	10,301	\$11,632
14-27515.002-R-1	20-03-108-033-1002	1,176	10,301	\$11,477
14-27515.003-R-1	20-03-108-033-1004	1,348	10,435	\$11,783
14-27515.004-R-1	20-03-108-033-1005	1,331	10,301	\$11,632
14-27515.005-R-1	20-03-108-033-1006	1,348	10,435	\$11,783
14-27515.006-R-1	20-03-108-033-1003	1,331	10,301	\$11,632

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 2014 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 five residential condominium units contained in a 109 year-old, three-story residential condominium building of masonry construction. Each unit is designated by a separate Property Index Number (PIN).¹ The property has a 6,556 square foot site located

¹ Each PIN is designated by its last four digits. The subject consists of PINs 1001, 1002, 1004, 1005 and 1006, but not 1003.

in Hyde Park Township, Cook County. The property is a Class 2-99 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted:

PIN 1001—a settlement statement disclosing the unit was purchased on August 20, 2010 for \$6,000 without evidence the subject was sold by a realtor;

PIN 1002—a settlement statement disclosing the unit was purchased on December 29, 2009 for \$10,000 in an all-cash transaction from Deutsche Bank National Trust Company;

PIN 1004—a settlement statement disclosing the unit was purchased on March 24, 2010 for \$11,500 from Litton Loan Servicing LP;

PIN 1005—a real estate contract dated December 2009 to sell the unit for \$4,500;

PIN 1006—a real estate contract dated December 2009 to sell the unit for \$6,600.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase prices when using the 2014 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the five-unit subject of \$68,746. The subject's assessment reflects a market value of \$687,460 when using the 2014 level of assessment of 10.00% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance. In support of its contention of the correct assessment, the board of review submitted a brief arguing that the sales of the various units were compulsory because there was no evidence they sold in arm's-length transactions for fair cash value.

At hearing, the appellant reiterated the argument in favor of an assessment reduction and that the subject did not include PIN 1003.

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 has not met this burden of proof and a reduction in the subject's assessment is not warranted.

In addressing the appellant's market value argument, the Board finds that the sales of the five units in the subject were not recent or were not supported by evidence that a sale occurred. PINs 1001, 1002 and 1004 sold from 2009 through 2010. These are not recent sales. The evidence pertaining to PINs 1005 and 1006 consisted only of real estate contracts without information of sales. There was no evidence PIN 1001, 1005 and 1006 were exposed to the open market through advertising or the services of a realtor.

The Board need not address the board of review's argument that the sales were compulsory. Instead, the Board finds that for PINs 1001, 1002 and 1004, the sales were not recent and, therefore, not reliable evidence of market value for the instant 2014 lien year. The Board finds that for PINs 1005 and 1006, there is no evidence of sales, only real estate contracts. Moreover, even if sales occurred, there is no evidence that they were recent.

In determining the fair cash value of the subject property and all relevant factors, the Board finds that the appellant did not submit sufficient evidence to show the subject was overvalued. Therefore, the Board finds that the appellant has not met its burden by a preponderance of the evidence and that the subject does not warrant a reduction based upon the market data submitted into evidence.

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

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: June 19, 2018



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

Irfan Sheikh, by attorney:
Edward P. Larkin
Attorney at Law
1645 South River Road
Suite 24
Des Plaines, IL 60018

COUNTY

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