



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

APPELLANT: Pravin Dedania  
DOCKET NO.: 16-24643.001-R-1  
PARCEL NO.: 01-22-400-023-0000

The parties of record before the Property Tax Appeal Board are Pravin Dedania, the appellant, by attorney Herbert B. Rosenberg, of Schoenberg Finkel Newman & Rosenberg 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 **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:** \$24,916  
**IMPR.:** \$186,998  
**TOTAL:** \$211,914

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 2016 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 2-story dwelling of masonry exterior construction with 11,773 square feet of living area. The dwelling was constructed in 1994. Features of the home include a finished basement, central air conditioning, three fireplaces and a 4-car garage. The property has a 90,605 square foot site and is located in South Barrington, Barrington Township, Cook County. The subject is classified as a class 2-09 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 an appraisal estimating the subject property had a market value of \$2,000,000 as of January 1, 2016. The appraisal was prepared by Robert S. Kang a certified general real estate appraiser. In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value.

The appraiser analyzed four comparable sales located in South Barrington, Illinois. The comparables consist of 2-story dwellings that were built from 1993 to 2001. The dwellings range in size from 7,013 to 12,784 square feet of living area and are situated on sites ranging in size from 58,718 to 135,278 square feet of land area. The comparables have finished basements and 4-car or 6-car garages. The comparables sold from June 2013 to August 2014 for prices ranging from \$1,150,000 to \$1,945,000 or from \$145.31 to \$175.80 per square foot of living area, including land. The appraiser determined that comparable sale #2 is more similar to the subject property and sold in June 2014 for a price of \$1,945,000 or \$152.14 per square foot of living area, including land.

Based on this evidence, the appellant requested the total assessment be reduced to \$200,000 which would reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$242,481.<sup>1</sup> The subject's assessment reflects a market value of \$2,424,810 or \$205.96 per square foot of living area, land included, when using the level of assessments for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of the subject's assessment, the board of review submitted information on four equity comparables<sup>2</sup> with the same neighborhood and classification codes as the subject property. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, counsel for the appellant critiqued the board of review's submission noting the evidence is based on assessment equity and does not address the appellant's overvaluation argument.

### **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.

The Board finds the appellant's appraisal is unpersuasive and not a credible indicator of value. The Board finds the appraisal lacked descriptive information about the improvements which prevents a meaningful analysis to determine the similarities of the comparables to the subject property. Furthermore, the Board gave little weight to the final opinion of value found in the appraisal due to the lack of adjustments for date of sale in relation to a 2016 market value.

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<sup>1</sup> The correct total assessment can be found on the appellant's submission of the 2016 decision of the Cook County Board of Review.

<sup>2</sup> The board of review included a grid analysis of four equity comparables which will not be further addressed on this record as the Board finds equity data is not responsive to the appellant's market value argument.

The Board will therefore examine the raw unadjusted sales found in the report. The Board finds the only evidence of market value in the record to be the appellant's comparables. The comparables sold from June 2013 to August 2014 for prices ranging from \$1,150,000 to \$1,945,000 or from \$145.31 to \$175.80 per square foot of living area, including land. The subject's total assessment reflects a market value of \$2,424,810 or \$205.96 per square foot of living area, including land, which falls above the range established by the comparables in this record. Based on this evidence, the Board finds the subject's assessment is not reflective of market value and a reduction in the subject's assessment is 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.

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Chairman



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Member



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Member



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Member

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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: September 17, 2019



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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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