



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

APPELLANT: Mahajabeen Majeed
DOCKET NO.: 17-21744.001-R-1
PARCEL NO.: 01-28-416-036-0000

The parties of record before the Property Tax Appeal Board are Mahajabeen Majeed, the appellant, by attorney Andrew J. Rukavina, of The Tax Appeal Company, in Mundelein, 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: \$11,756
IMPR.: \$98,244
TOTAL: \$110,000

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 2017 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 two-story dwelling of masonry exterior construction with approximately 5,640 square feet of living area.¹ The dwelling is approximately 9 years old. Features of the home include a full basement that is 75% finished, central air conditioning, a fireplace and a four-car garage.² The property has a 42,752 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.

¹ The Board finds that the appellant's appraiser provided the best evidence of the subject's dwelling size with descriptive information and supporting interior photographs setting forth evidence of the substantial open foyer area and living area above the garage.

² While the assessing officials report an unfinished basement, the appellant's appraiser who viewed the property indicated that the basement is 75% finished

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal prepared by Steven L. Smith, a Certified Residential Real Estate Appraiser. Utilizing the sales comparison approach to value, the appraiser estimated the subject property had a market value of \$1,040,000 as of January 1, 2017.

The four comparable properties are located on the same street as the subject and within .07 of a mile from the subject. The parcels range in size from 35,310 to 47,368 square feet of land area and are improved with two-story dwellings that were each approximately 9 years old. The homes range in size from 4,216 to 5,824 square feet of living area. Each comparable has a full basement, three of which have finished area. Each home has central air conditioning, one or two fireplaces and a three-car or a four-car garage. The comparables sold from July 2014 to October 2016 for prices ranging from \$780,000 to \$1,135,000 or from \$145.95 to \$240.80 per square foot of living area, including land.

As part of the Addendum, the appraiser reported that comparable sales #1 and #2 were each short sales with other differences from the subject and comparable sales #3 and #4 were each "dated" 2014 sales, however, the appraiser affirmatively stated there were no other recent arm's length sales of similar sized dwellings in the subject's neighborhood in the prior year. The appraiser applied adjustments to the comparables for differences in sales/financing concessions, date of sale, site size, view, condition, above-grade area, bathroom count, dwelling size, basement finish, number of fireplaces, other amenities and/or garage size. From this process, the appraiser arrived at adjusted sales prices ranging from \$960,300 to \$1,064,404. In reconciliation, the appraiser gave most weight to comparables #1 and #3. Through this process, Smith opined a market value for the subject property of \$1,040,000 or \$184.40 per square foot of living area, including land, as of January 1, 2017.

Based on this evidence, the appellant requested a reduced total assessment reflective of the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$133,365. The subject's assessment reflects a market value of \$1,333,650 or \$236.46 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, two of which sold. As the equity data for comparables #1 and #2 are not responsive to the basis of this appeal, the data will be not analyzed herein. Comparables #3 and #4 consist of properties located in the same neighborhood code as the subject. The parcels contain 59,056 and 33,059 square feet of land area, respectively, and have each been improved with a two-story dwelling of masonry or frame and masonry exterior construction. The dwellings are 1 and 4 years old, respectively, and contain 6,864 and 5,323 square feet of living area, respectively. Each home has a full basement, one of which has a formal recreation room. Each dwelling features central air conditioning, a fireplace and either a three-car or a four-car garage. These two comparables sold in November 2014 and October 2015, respectively, for prices of \$1,181,140 and \$1,574,204 or for \$221.89 or \$229.34 per square foot of living area,

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

The appellant submitted an appraisal of the subject property and the board of review provided two comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparable sale #3 due to its age of 1 year old and substantially larger dwelling size of 6,864 square feet of living area, when compared to the subject.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant along with board of review comparable sale #4 which sold in November 2014 for \$1,181,140 and \$221.89 per square foot of living area, including land. In summary, the best comparable sales evidence in the record consists of five properties that sold from July 2014 to October 2016 for prices ranging from \$780,000 to \$1,181,140,000 or from \$145.95 to \$240.80 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,333,650 or \$236.46 per square foot of living area, including land, which is above the appraised value and above the best comparable sales in the record, including the one dated sale presented by the board of review as comparable #4. After considering record of the best most recent sales, the Board finds the subject property is overvalued and had a market value of \$1,100,000 or \$195.04 per square foot of living area, including land, 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: August 24, 2021



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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