



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

APPELLANT: Ashraf Memon
DOCKET NO.: 17-30651.001-R-1
PARCEL NO.: 09-15-218-115-0000

The parties of record before the Property Tax Appeal Board are Ashraf Memon, the appellant, by attorney George N. Reveliotis of Reveliotis Law, P.C. in Park Ridge; 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:

LAND: \$2,743
IMPR.: \$19,064
TOTAL: \$21,807

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 frame and masonry dwelling with 1,916 square feet of living area. The dwelling is approximately 51 years old and features an unfinished partial basement, central air-conditioning, a fireplace and a one-car garage. The property has a 3,135 square foot site and is located in Des Plaines, Maine Township, Cook County. The subject is classified as a class 2-95 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 information on four comparable sales located within the same neighborhood code as the subject property and within approximately 1.2 miles of the subject. The comparables have sites that range in size from 2,830 to 3,292 square feet of land area and are improved with similar class 2-95 dwellings of frame and masonry construction. The dwellings range in size

from 1,777 to 2,040 square feet of living area and range in age from 49 to 53 years old. The comparables each have a partial basement, one of which has finished area. Three comparables have central air-conditioning. Two comparables each have one-car garage. The properties sold from July 2015 to October 2016 for prices ranging from \$155,000 to \$200,000 or from \$87.23 to \$98.04 per square foot of living area, including land.

Based on this evidence, the appellant requested that the subject's total assessment be reduced to \$17,832. The requested assessment would reflect a total market value of \$178,320 or \$93.07 per square foot of living area, land included, when applying the 10% level of assessment 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 subject of \$21,807. The subject's assessment reflects a market value of \$218,070 or \$113.82 per square foot of living area, including land, when applying the 2017 three-year average median level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales, two of which are located in the city of Des Plaines and have the same neighborhood code as the subject. Comparables #3 and #4 are located in the city of Park Ridge. The comparables consist of two-story frame and masonry dwellings that range from 30 to 51 years old. The dwellings range in size from 1,568 to 1,930 square feet of living area. Each dwelling has a basement, two with finished area, and central air conditioning. Two comparables each have a fireplace. Three comparables each have a one-car or two-car garage. The dwellings are situated on sites ranging in size from 1,200 to 3,243 square feet of land area. The properties sold from March to August 2016 from \$225,000 to \$410,000 or from \$129.96 to \$212.44 per square foot of living area. Based on the above evidence, the board of review requested confirmation of the subject's assessment.

The board of review also submitted information on four equity comparables which is not responsive to 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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of eight suggested comparable sales for the Board's consideration. The Board gave less weight to appellant's comparable sales #1, #3 and #4 as comparables #1 and #3 each lack a garage, dissimilar to the subject, and as the July 2015 sale of comparable #3 is dated relative to the January 1, 2017 assessment date at issue. The Board also gave less weight to board of review comparables #2, #3 and #4 as comparable #2 also lacks a garage, dissimilar to

the subject, and as comparables #3 and #4 are both located in a different town and have a different neighborhood code than the subject.

The Board finds the best evidence of market value to be appellant's comparable sale #2 and board of review comparable sale #1 which are similar to the subject property in location, age, design, and most features. These comparables sold in June and March 2016 for \$200,000 or \$249,000 or \$98.04 and \$129.96 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$218,070 or \$113.82 per square foot of living area, including land, which is supported by the best comparable sales in this record. After considering adjustments to the comparables for differences from the subject, the Board finds a reduction in the subject's assessment is not 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.



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: March 16, 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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