



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

APPELLANT: Reyad & Wafa Shalabi  
DOCKET NO.: 17-34500.001-R-1  
PARCEL NO.: 24-04-212-006-0000

The parties of record before the Property Tax Appeal Board are Reyad & Wafa Shalabi, the appellants, by attorney Scott L. David, of Much Shelist, 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 **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:** \$ 3,492  
**IMPR.:** \$10,178  
**TOTAL:** \$13,670

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants 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 one-story dwelling of frame exterior construction with 1,248 square feet of living area. The dwelling is approximately 63 years old. Features of the home include a crawl-space foundation and a two-car garage. The property has a 6,350 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 appellants originally filed an appeal marking the basis of appeal as recent appraisal along with a request for an extension of time to submit evidence. The appellants' subsequent submission of evidence lacked the necessary basis of appeal (35 ILCS 200/16-180; 86 Ill.Admin.Code §1910.30(j)) but provided a brief along with four comparable properties with equity data, two of which have dated sales information. In the absence of sufficient recent market value evidence to assert overvaluation of the subject property (86 Ill.Admin.Code

§1910.65(c)(4)), the Board will analyze this appeal based on the brief and evidence wherein the appellants imply assessment inequity as the basis of this appeal.

In support of the inequity argument the appellants submitted information on four comparables located in the same neighborhood code as the subject. The comparables consist of one-story class 2-03 dwellings of frame, masonry or frame and masonry exterior construction for three of the comparables; no exterior type was reported for comparable #2. The homes range in age from 65 to 99 years old and range in size from 1,064 to 1,481 square feet of living area. Two comparables have full unfinished basements and two comparables have concrete slab foundations. One dwelling has central air conditioning. Two comparables have either a one-car or a two-car garage. The comparables have improvement assessments ranging from \$5,640 to \$9,690 or from \$4.69 to \$6.54 per square foot of living area. Based on this evidence, the appellants as set forth in the Residential Appeal petition requested a reduced improvement assessment of \$5,508 or \$4.41 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$13,670. The subject property has an improvement assessment of \$10,178 or \$8.16 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables located in the same neighborhood code as the subject property and within ¼ of a mile of the subject. The comparables consist of one-story class 2-03 dwellings of masonry or frame and masonry exterior construction. The homes range in age from 49 to 63 years old and range in size from 1,105 to 1,456 square feet of living area. Two comparables have full unfinished basements and two comparables have either a slab or crawl-space foundation. One dwelling has central air conditioning and each comparable has a two-car garage. The comparables have improvement assessments ranging from \$11,289 to \$15,984 or from \$9.61 to \$12.93 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The taxpayers contend assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellants 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 comparable properties to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellants' comparables #3 and #4 along with board of review comparables #1 and #3 due to their superior full basement features as compared to the subject's crawl-space foundation.

The Board finds the best evidence of assessment equity to be appellants' comparables #1 and #2 along with board of review comparables #2 and #4 despite some differences in dwelling size and/or other amenities. These comparables had improvement assessments that ranged from \$5,640 to \$13,998 or from \$4.69 to \$10.08 per square foot of living area. The subject's improvement assessment of \$10,178 or \$8.16 per square foot of living area falls within the range established by the best comparables in this record and appears to be particularly well-supported by board of review comparable #4 once differences are considered. Based on this record, the Board finds the appellants did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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: July 20, 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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