



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

APPELLANT: Farideh Harandi
DOCKET NO.: 19-45578.001-R-1
PARCEL NO.: 17-03-101-029-1112

The parties of record before the Property Tax Appeal Board are Farideh Harandi, the appellant; 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: \$2,342
IMPR.: \$17,658
TOTAL: \$20,000

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 2019 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 61-year-old, single-family condominium with 700 square feet of living area and one bedroom. The subject condominium is in a masonry building on an 8,008 square foot site and is located North Chicago Township, Cook County. The subject is classified as a class 2-99, residential 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 the subject's sale as well as on four comparable sales. As to the subject's sale, the appellant submitted copies of the subject's deed and real estate transfer tax that support the sale on March 28, 2012, for a price of \$190,000. The appellant asserts that no improvements have been undertaken since the purchase.

In addition, the appellant submitted data on four sale comparables. The appellant indicated that these properties are located within the subject's same building and are of the same age and amenities. Specifically, each condominium was 61 years of age with 700 square feet of living area and one bedroom. They sold from April, 2017 through September, 2020 for unadjusted values that ranged from \$172,400 to \$207,500, or from \$246 to \$296 per square foot of living area. Further, the appellant submitted copies of the multiple listing sheets for the above sales. The appellant requested a total assessment of \$19,000 which reflects a market value of \$190,000 or \$271 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 \$33,192. The subject's assessment reflects a market value of \$331,920 or \$474 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 limited information on 35 comparable sales located in the subject's building. The condominiums ranged in percentage of ownership from 0.2250% to 1.3570%, while none of the properties containing the same percentage of ownership as the subject at 0.5300%. The properties sold from September, 2016 through November, 2020 for unadjusted prices that ranged from \$149,000 to \$865,000. There was no data as to each unit's square footage of living area. This sales data was added together to indicate a total value for the building of \$10,980,976, resulting in a value for the subject unit of \$381,508.

In addition, the board of review submitted a copy of an appraisal for the subject property with a market value of \$210,000 and an effective date of December 30, 2021. The appraisal indicated that the subject is owner-occupied, while developing a sales comparison approach. Moreover, the appraisal indicated that an interior and exterior inspection had been undertaken with photographs attached therein.

In written rebuttal, the appellant reiterated his prior arguments in his initial pleadings.

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.

Initially, the Board finds that diminished weight is accorded the subject's sale in 2012 due to its distance in time from the assessment year at issue which is January 1, 2019.

Further, the Board accords diminished weight to the board of review's sales and analysis due to the absence of data such as square footage of living area as well as the absence of any adjustments to the sales data.

Therefore, the Board finds the best evidence of market value for this owner-occupied subject to be *appellant's comparable sales, which was supported by the appraisal submitted into evidence by the board of review*. These comparables sold for unadjusted prices ranging from \$246 to \$296 per square foot of living area, including land. The subject's assessment reflects a market value of \$474 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. Moreover, the sales and supporting appraisal reflect an upward trend in market values.

Based on this evidence and after making pertinent adjustments, the Board finds 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.



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:

May 17, 2022



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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