



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

APPELLANT: Mahasen Hamideh & Mousa Abuhadba
DOCKET NO.: 20-36954.001-R-1 through 20-36954.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Mahasen Hamideh & Mousa Abuhadba, the appellants, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
20-36954.001-R-1	27-27-104-025-0000	2,367	15,563	\$17,930
20-36954.002-R-1	27-27-104-054-0000	1,004	0	\$1,004

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 2020 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 multi-level dwelling of frame and masonry exterior construction with 1,230 square feet of living area. The dwelling is approximately 42 years old. Features of the home include a basement with finished area and a 2-car garage. The property has an 8,249 square foot site and is located in Orland Hills, Orland Township, Cook County. The subject is classified as a class 2-34 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend assessment inequity concerning the improvement as the basis of the appeal. In support of this argument the appellants submitted information on three equity comparables located within the same assessment neighborhood code and from 2.6 to 2.9 miles from the subject. The comparables are improved with class 2-34 homes of masonry or frame and masonry exterior construction ranging in size from 1,075 to 1,276 square feet of living area. The

dwellings range in age from 51 to 62 years old. Each home has a basement with finished area and a 2-car garage. One home has central air conditioning. The comparables have improvement assessments ranging from \$8,839 to \$9,933 or from \$7.46 to \$8.28 per square foot of living area. Based on this evidence, the appellants requested a reduction in the subject's improvement assessment to \$9,828.

The appellants also submitted final decisions of the board of review for both subject parcels with a total combined assessment of \$18,934. The appellants reported the subject has a total improvement assessment of \$15,563.

The board of review submitted one set of its "Board of Review Notes on Appeal" disclosing the total assessment for parcel 27-27-104-025-000 of \$17,930. The subject property has an improvement assessment of \$15,563 or \$12.65 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on three equity comparables as comparable #4 is a duplicate of comparable #1. The comparables are located within 0.25 of a mile from the subject, one of which is within the same assessment neighborhood code as the subject. The three comparables are improved with multi-level, class 2-34 homes of frame and masonry exterior construction ranging in size from 1,196 to 1,327 square feet of living area. The dwellings range in age from 27 to 30 years old. Each home has a basement with finished area and a 2-car garage. Two homes have central air conditioning and one home has a fireplace. The comparables have improvement assessments ranging from \$18,263 to \$19,187 or from \$14.09 to \$15.27 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 appellants 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 record contains a total of six equity comparables for the Board's consideration. The Board gives less weight to the appellant's comparables, which are located more than one mile from the subject.

The Board finds the best evidence of assessment equity to be the board of review's comparables, which are located more proximate to the subject and are similar to the subject in dwelling size and some features, although these comparables are much newer homes than the subject and two comparables have central air conditioning unlike the subject, suggesting downward adjustments to these comparables would be needed to make them more equivalent to the subject. These comparables have improvement assessments that range from \$18,263 to \$19,187 or from \$14.09

to \$15.27 per square foot of living area. The subject's improvement assessment of \$15,563 or \$12.65 per square foot of living area falls below the range established by the best comparables in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, 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: June 18, 2024



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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