



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

APPELLANT: Neha & Parin Desai Knowhere 1713 LLC
DOCKET NO.: 20-42688.001-R-1
PARCEL NO.: 28-14-413-011-0000

The parties of record before the Property Tax Appeal Board are Neha & Parin Desai Knowhere 1713 LLC, the appellant, by attorney Jennifer Truong of Behrens & Truong LLC 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 ***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: \$7,986
IMPR.: \$2,014
TOTAL: \$10,000

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 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 two-story apartment building of frame and masonry exterior construction with 3,222 square feet of living area.¹ The building is approximately 92 years old. Features of the home include a partial unfinished basement and three apartment units. The property has an approximately 39,930 square foot site and is located in Markham, Bremen Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on March 10, 2020 for a price of \$100,000. The appellant completed Section IV—Recent Sale Data of the appeal petition indicating the subject property was purchased from Lior & Ruth Coresh, the parties to the

¹ The Board finds the only description of the subject property was provided by the appellant.

transaction were not related, the property was sold through a realtor and had been advertised for sale since August 2019. To document the sale the appellant provided a copy of the closing statement indicating a sale date of March 11, 2020 and reiterating purchase price. The appellant also submitted interior and exterior photographs of the subject property, as well as computer generated printouts and a printout from the Redfin website that depicted listing and sales information regarding the subject property. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The appellant submitted a copy of the 2020 final decision issued by the Cook County Board of Review disclosing the total assessment for the subject of \$16,500. The subject's assessment reflects a market value of \$165,000 or \$51.21 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%.

The board of review submitted its "Board of Review Notes on Appeal" for Docket Number 18-50185 and identifies the subject with a different parcel located in a different township. The board of review also submitted information on four equity comparables located in Alsip. The comparables are class 2-02 properties improved with one-story single-family dwellings. The board of review indicated that comparable #3 sold in May 2017, 31 months prior to the January 1, 2020 assessment date, for \$113,000 or \$127.83 per square foot of living area, land included. Since equity data is not responsive to the appellant's overvaluation argument and the only sale data provided was for a single-family residence that occurred 31 months prior to the assessment date at issue, these four comparables will not be further addressed in this analysis.

In written rebuttal, counsel for the appellant argued that "the board of review submission in this appeal (20-42688) consists of a completed Notes on Appeal Form for PIN 24-28-204006-0000 and Docket Number 18-50185 with no supporting documentation for the subject appeal (2020-42688). Based on the lack of evidence submitted by the board of review the appellant requests a default judgement at the requested 2020 AV of \$10,000."

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 Board finds the only evidence of market value to be the purchase of the subject property in March, 2020 for a price of \$100,000. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a realtor, the property had been advertised on the open market. In further support of the transaction the appellant submitted a copy of the closing statement. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction or

to refute the contention that the purchase price was reflective of market value. Based on this record the Board finds the subject property had a market value of \$100,000 as of January 1, 2020. Since market value has been determined the 2020 three year average median level of assessments 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: 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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