

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Inder Chadha

DOCKET NO.: 21-25879.001-R-1 through 21-25879.002-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Inder Chadha, the appellant(s), by attorney Peter D. Verros, of Verros Berkshire, PC in Oakbrook Terrace; 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
21-25879.001-R-1	29-11-116-001-0000	1,378	1,172	\$2,550
21-25879.002-R-1	29-11-116-002-0000	1,171	1,172	\$2,343

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 2021 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 contains two PINs and consists of a 66-year-old, one-story, single-family dwelling of frame construction with 906 square feet of living area. Features of the home include a slab foundation, central air conditioning, and a 1.5-car garage. The property has a 3,675 square foot site and is located in Dolton, Thornton Township, Cook County. The subject is classified as a Class 2-02 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant submitted a board of review decision that showed the assessed value of the subject property to be \$4,893. In Section II, question 2c of the residential appeal, the appellant lists the improvement assessment as \$2,344 and the total assessment as \$4,893. In the "Addendum to Petition," the appellant lists the two PINs as having a combined improvement assessment of

\$2,344 and a combined total assessment of \$4,893. In section V, the appellant lists the improvement assessment as \$2,598 and the total assessment as \$5,148.

The appellant contends assessment inequity as the basis of the appeal. In support of this argument the appellant submitted information on four Class 2-02 comparables with varying degrees of similarities to the subject. The comparables were located within 0.4-miles of the subject property. The comparables had improvement assessments ranging from \$0.70 to \$1.46 per square foot of living area. The appellant requested the subject's total assessment be reduced to \$3,374.

The board of review submitted its prorated "Board of Review Notes on Appeal" disclosing the total assessment of PIN -001 as having an improvement assessment of \$1,172 and a total assessment of \$2,550, but did not provide the total assessment of PIN -002. The board of review presented evidence that PIN -001 had improvement assessment of \$1,172 or \$1.29 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four Class 2-02 suggested equity comparables with varying degrees of similarity to the subject. One comparable was located within a quarter of a mile of the subject property and three other comparables were located within a block of the subject property. The comparables had improvement assessments that ranged from \$3.09 to \$3.21 per square foot of living area. Based on this evidence, the board of review requested that the assessment be confirmed.

The Board finds that the subject property had a total assessment of \$4,893, a total improvement assessment of \$2,344, and an improvement assessment per square foot of living space as \$2.59.

Conclusion of Law

The taxpayer contends 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 proven 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 appellant did not meet this burden of proof, and that a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of assessment equity to be appellant's comparables #2 and #4 and the board of review's comparables #1, #2, #3, and #4. These comparables had improvement assessments that ranged from \$0.72 to \$3.21 per square foot of living area. The subject's improvement assessment of \$2.59 per square foot of living area falls within the range established by the best comparables in this record. After considering all the comparables submitted by the parties with emphasis on those properties that are more proximate in location, more similar in size, and with similar features relative to the subject and after further considering adjustments to the best comparables for differences from the subject, the Board finds the subject's improvement assessment is supported. The Board finds that the appellant failed to demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and, therefore, a reduction in the subject's assessment commensurate with the appellant's request 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.

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- -	Chairman
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Member	Member
Dan Dikini	Sarah Bokley
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:	October 15, 2024		
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	Clerk of the Property Tax Appeal Board		

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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 <u>PETITION AND EVIDENCE</u> 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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APPELLANT

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COUNTY

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