



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

APPELLANT: Sajal Agarwal
DOCKET NO.: 21-31542.001-R-1
PARCEL NO.: 17-06-126-053-0000

The parties of record before the Property Tax Appeal Board are Sajal Agarwal, the appellant(s), by attorney Joanne Elliott, of Elliott & Associates Attorneys, PLLC in Des Plaines; 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: \$27,368
IMPR.: \$128,632
TOTAL: \$156,000

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 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 consists of an approximately 16-year-old, three-story, single-family dwelling of masonry construction with 4,120 square feet of living area. Features of the home include a full basement with a recreation room, central air conditioning, two fireplaces and a two-car garage. The property has a 3,421 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant asserts overvaluation in this appeal. In support of the overvaluation argument, the appellant submitted evidence disclosing that the subject property was purchased on January 21, 2020, for a price of \$1,230,000. Appellant also submitted a brief, requesting the Illinois Department of Revenue three-year median level of assessment of 8.31% be applied to the sales price. In support, appellant submitted a press release dated, June 29, 2021, from the Illinois

Department of Revenue. Based on this evidence, the appellant requested a reduction in the subject's assessment to \$102,213.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$156,000. The subject's assessment reflects a market value of \$1,560,000 or \$378.64 per square foot of living area, land included, when using the Cook County Real Estate Classification Ordinance level of assessment for class 2 property of 10%.

In support of its contention of the correct assessment the board of review submitted information on one suggested equity comparable, which contained no sales data. The board of review noted the subject property sold in January 2020 for \$1,230,000.

In rebuttal, appellant requested that the Board apply the 2021 adjusted median ratio of 8.83% of fair market value based on the Illinois Department of Revenue's 2021 sales-ratio study. Appellant supported the request with the press release dated October 18, 2022. The appellant noted these documents were not yet available at the time of their original filing with a request of 8.31% and requests this Board to accept the newly established multiplier.

Conclusion of Law

As a preliminary matter, the Board finds the appellant's assertion that an 8.83% assessment level should apply based on the Department of Revenue's sales-ratio study for 2020 and 86 Ill.Admin.Code §1910.50(c)(2)(A) is misguided. This rule allows annual sales ratio studies from the previous three years to be considered at the Board's discretion. Appellant did not submit any sales ratio studies and only provided a press release from the Illinois Department of Revenue in support. Accordingly, the Board will apply the assessment level as established by the Cook County Real Property Assessment Classification Ordinance of 10% to any market value established by the Board.

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

This Board gives significantly diminished weight to the subject's sale as it was never exposed to the open market. Real property in Illinois must be assessed at its fair cash value, which can only be estimated absent any compulsion on either party.

Illinois law requires that all real property be valued at its fair cash value, estimated at the price it would bring at a fair voluntary sale where the owner is ready, willing, and able to sell but not compelled to do so, and the buyer is likewise ready, willing, and able to buy, but is not forced to do so.

Bd. of Educ. of Meridian Cmty. Unit Sch. Dist. No. 223 v. Ill. Prop. Tax Appeal Bd., 961 N.E. 2d 794, 802 (2d Dist. 2011) (citing Chrysler Corp. v. Ill. Prop. Tax Appeal Bd., 69 Ill. App. 3d 207, 211 (2d Dist. 1979)).

A contemporaneous sale between parties dealing at arms-length is not only relevant to the question of fair cash market value, (see People ex rel. Korzan v. Chicago, Burlington Quincy Railroad Co. 32 Ill.2d 554 and People ex rel. Musso v. Chicago, Burlington Quincy Railroad Co. 33 Ill.2d 88,) but would be practically conclusive on the issue of whether an assessment was at full value. The sale price of property does not necessarily establish its market value, however, without further information such as the relationship between the buyer and seller and the circumstances of the transaction. Ellsworth Grain Co. v. Ill. Property Tax Appeal Bd., 172 Ill. App. 3d 552, 557 (4th Dist. 1988). This is theoretically an objective standard of valuation. The value of particular property is set by the forces of the marketplace at a given place and time.

The Board finds that the 2020 sale of the subject property did not offer the best evidence of market value. The appellant completed Section IV - Recent Sale Data of the PTAB residential appeal form and disclosed that the property was not a transfer between related parties, it was sold by owner after an undisclosed amount of time, without advertising the property for sale, and was not sold because of a foreclosure action. The appellant submitted the settlement statement in support.

This Board finds the subject's lack of open market exposure fails to meet a fundamental requirement to be considered an arm's-length transaction reflective of fair cash value. While the board of review failed to submit sufficient evidence in support of its contention of a correct assessment, the appellant ultimately had the burden of showing overvaluation in the assessment process by a preponderance of the evidence. The appellant failed to satisfy this burden. The Board therefore finds that a reduction in the subject's assessment on the evidence provided by the appellant 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: _____

August 19, 2025



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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