



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

APPELLANT: Abhishek Rajgarhia
DOCKET NO.: 21-32335.001-R-1
PARCEL NO.: 17-06-205-057-1002

The parties of record before the Property Tax Appeal Board are Abhishek Rajgarhia, the appellant, by Abby L. Strauss, attorney-at-law of Schiller Law 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:

LAND: \$6,038
IMPR.: \$64,422
TOTAL: \$70,460

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 a residential condominium unit located in a two-story building of brick and block construction that is approximately 16 years old. Features of the property include central air conditioning, one fireplace, three bathrooms and a detached garage. The condominium contains two units, and the subject property has a 54.84% of ownership interest in the common elements.¹ The property has a 2,420 square foot site located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-99 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 evidence disclosing the subject property was purchased on January 16, 2019,

¹ The percentage of ownership interest in the condominium for the subject property was obtained from the evidence provided by the Cook County Board of Review.

for a price of \$675,000. The appellant completed Section IV – Recent Sale Data of the appeal identifying the sellers as Nikhill Krishman and Shitz Rajgarhia and indicated the parties to the transaction were not related. The appellant also disclosed the subject was sold through a realtor and had been advertised in the Multiple Listing Service (MLS) for 27 days. To document the transaction the appellant submitted a copy of the subject's MLS listing and a copy of the closing statement dated January 16, 2019, disclosing the purchase price of \$675,000 and the payment of commissions. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$70,460. The subject's assessment reflects a market value of \$704,600 when using the level of assessments for class 2-99 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted a copy of a Condominium Analysis Results for 2021 for the subject's condominium building disclosing the subject unit has a 54.94% ownership interest in the condominium. In support of its contention of the correct assessment the board of review submitted information on the sales of both units in the subject's condominium, which includes the subject's sale, that have a 45.16% and a 54.84% ownership interest in the subject's condominium, respectively. These properties sold in January 2019 and July 2021 for prices of \$675,000 and \$610,000, respectively. The board of review determined that the total adjusted consideration for the two units was \$1,285,000. The board of review determined the full market value for the condominium was \$1,285,000 and the full assessed value of the condominium was \$128,500. Multiplying the full market value of the condominium by the subject's percentage of ownership interest of 54.94% results in an estimated value for the subject unit of \$705,979 and a total assessment of \$70,598 when applying the level of assessment for class 2-99 property under the Cook County Real Property Assessment Classification Ordinance of 10%, which is slightly greater than the subject's total assessment.

In rebuttal the appellant's counsel contends the board of review failed to address the issue before the Property Tax Appeal Board of the subject's market value and the proper level of assessment. Counsel further argued that the board of review submission did not comply with section 1910.55(c) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.55(c)) requiring not fewer than three sales and the data did not come from a verified source or reflect adjustments for differences from the subject.

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

The Board finds the best evidence of market value to be the analysis presented by the board of review using the sale of the subject property and the sale of the only other residential

condominium unit located in the subject's condominium. The second residential unit used by the board of review sold more proximate in time to the assessment date at issue than did the sale of the subject property which adds credibility to the board of review analysis. Using the sales of both residential condominium units located in the subject's condominium the board of review determined the full market value for the condominium would be \$1,285,000 and the full assessed value of the condominium would be \$128,500. Multiplying the full market value of the condominium by the subject's percentage of ownership interest of 54.94% results in an estimated value for the subject unit of \$705,979 and a total assessment of \$70,598 when applying the Cook County Real Property Assessment Classification Ordinance level of assessment for class 2-99 property of 10%, which is slightly greater than the subject's total assessment of \$70,460. Based on this evidence the Board finds the subject's assessment is reflective of fair cash value 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: May 20, 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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