FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Sanjoy Chowdhury
DOCKET NO.: 21-34362.001-R-1
PARCEL NO.: 16-12-324-005-0000

The parties of record before the Property Tax Appeal Board are Sanjoy Chowdhury, the appellant(s), by attorney Jeffrey G. Hertz, of Sarnoff Property Tax 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:	$6,994
IMPR.:	$32,106
TOTAL:	$39,100

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 102-year-old, three-story dwelling of masonry construction with 7,596 square feet of living area. A feature of the home is a full basement. The property has a 5,952 square foot site and is located in Chicago, West Chicago Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation and inequity for the property as the bases of the appeal. In support of the market value argument, the appellant submitted evidence disclosing the subject property was sold on December 19, 2019 for a price of $391,000. The appellant submitted into evidence copies of the purchase contract, deed, CoStar listing, and Cook County Assessor's Office sales questionnaire disclosing the sale date and price; the transfer was not between family or related corporations and was sold by realtor; the subject was advertised for sale on the

Multiple Listing Service for 388 days; and the subject was not sold due to a foreclosure action. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect 10% of the purchase price.

In support of the inequity argument, the appellant submitted information on three suggested equity comparable properties with varying degrees of similarities to the subject. These comparables are described as masonry construction dwellings. They range in age from 91 to 130 years; in size from 7,149 to 7,512 square feet of living area; and an improvement assessment from $2.36 to $2.94 per square foot of living area. The suggested comparable properties are located within a two-mile radius of the subject property. The appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of $46,872. The subject property has an improvement assessment of $39,879 or $5.25 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four suggested equity comparable properties with varying degrees of similarities to the subject. These comparables are described as frame or masonry construction, two- or three-story dwellings. They range in age from 121 to 143 years; in size from 1,888 to 2,960 square feet of living area; and an improvement assessment ranging from $2.63 to $8.16 per square foot of living area. The properties are located within a ¼-mile radius of the subject property. The board of review requested that the assessment be confirmed.

Prior to the scheduled hearing date, the parties waived their right to a hearing and agreed to have the Board render its decision based on the evidence previously submitted.

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 meet this burden of proof and a reduction in the subject's assessment is warranted.

The Board's task in this case is to determine the correct assessment of the subject property. *See* 35 ILCS 200/16-180. Under Illinois law, real property must be valued at its fair cash value, meaning the price that would be paid for it at a fair, voluntary sale where the buyer and seller are both ready, willing, and able to buy and sell, but neither is compelled to do so. Bd of Educ of Meridian Community School Dist. No. 223 v. Ill. Property Tax Appeal Bd., 2011 IL App (2d) 100068, ¶ 36. A contemporaneous sale of the subject property between parties dealing at arms-length is practically conclusive on the issue of whether an assessment reflected the fair cash market value of the property. Gateway-Walden LLC v. Pappas, 2018 IL App (1st) 162714, ¶ 33.

The Board finds the appellant filled out Section IV - Recent Sale Data of the PTAB residential appeal form and disclosed that the parties to the transaction were not related, the property was sold by a realtor, and the property had been advertised through Multiple Listing Service (MLS).

The appellant also disclosed that the sale was not due to a foreclosure action. The appellant submitted a copy of the purchase contract, warranty deed, CoStar listing, and Cook County Assessor's Office sales questionnaire from the transaction. The Board finds that this evidence indicates that this sale was an arm's-length transaction and confirmed the sale price of the subject property in December of 2019.

The Board finds that the best evidence of the subject's market value is the December 19, 2019 sale of the subject for $391,000. Because the subject's assessment reflects a market value of $468,720, which is greater than the $391,000 sale price, a reduction in the subject's assessment commensurate with that sale price is warranted. Since market value has been determined, the Board finds that the subject is now fairly and equitably assessed. See Central Nursing Realty, LLC v. Illinois Property Tax Appeal Board, 2020 IL App (1st) 180994, ¶¶ 34-36.

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:

C E R T I F I C A T I O N

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: November 17, 2026

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 9-215 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

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