



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

APPELLANT: Farzaneh Fazel Sarjui  
DOCKET NO.: 21-39310.001-R-1  
PARCEL NO.: 17-10-200-065-1040

The parties of record before the Property Tax Appeal Board are Farzaneh Fazel Sarjui, the appellant; 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:** \$ 989  
**IMPR.:** \$24,451  
**TOTAL:** \$25,440

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 is a residential condominium unit with a 0.3130% ownership interest in the common elements. It is situated in a 329-unit, 92-year-old, multi-story building. The property has a 17,132 square foot site and is in North 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 indicated that the subject property is owner-occupied.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted a settlement statement and a printout from *Zillow.com* disclosing the subject property was purchased on June 14, 2021 for a price of \$250,000. The appellant disclosed: that he renovated the subject at a cost of \$4,400 before occupying the subject, that the parties to the sale were unrelated; that a realtor was involved in the transaction, that the property was listed on the open market for 140 days; and that the sale was not pursuant to a foreclosure action. Based on

this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price plus renovation costs.

In support of its contention of the correct assessment, the board of review submitted a condominium analysis with information on 44 suggested comparable sales in the building, one of which was the subject unit. The sales occurred between 2018 and 2021. They sold for a total consideration of \$13,738,866. The board of review disclosed the units sold consisted of 15.221% of all units in the building. The result yielded a full value of the property at \$90,262,571. Since the subject comprised 0.3130% of all the units in the building, the board of review suggested the market value of the subject to be \$282,522. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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 has met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of market value to be the sale of the subject for \$250,000 plus the \$4,400 cost of renovations. The appellant submitted evidence indicating the property was sold using a realtor, was advertised on the open market, and the parties to the transaction were unrelated. Additionally, there was no evidence from either party that indicated the sale was a short sale or a foreclosure. Since the market value of this parcel has been established, the assessment level of 10% as established by the Cook County Real Property Assessment Classification Ordinance shall apply, per the appellant's request. 86 Ill. Admin. Code § 1910.50(c)(3).

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:

October 17, 2023



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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