



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

APPELLANT: Tushar & Kerul Mehta
DOCKET NO.: 21-51010.001-R-1 through 21-51010.002-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Tushar & Kerul Mehta, the appellants, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
21-51010.001-R-1	17-03-200-063-1222	2,091	20,861	\$22,952
21-51010.002-R-1	17-03-200-063-1223	3,159	31,519	\$34,678

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 two residential condominium units with a combined 2,374 square feet of living area. The units are located in a multi-story building that is approximately 61 years old. Features include 3 bedrooms, 3 bathrooms, and one garage parking space. The subject has a combined 1.0370% interest in the common elements of the condominium. The property has a 20,255 square foot site and is located in Chicago, 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 appellants' appeal is based on overvaluation. In support of this argument the appellants submitted evidence disclosing the subject property was purchased on May 24, 2019 for a price of \$500,000. The appellants completed Section IV of the appeal petition disclosing the sale was not between related parties, the property sold through a realtor and was advertised for sale through

the Multiple Listing Service for 41 days, and the sale was not due to foreclosure or by contract for deed. In support of the sale the appellants submitted a closing statement indicating payment of a realtor's commission and a listing sheet.

The appellants also submitted a brief contending the 2021 final three year average multiplier for residential properties of 8.83% should be applied. The appellants submitted a copy of the announcement of the final multiplier. The appellants requested a reduction in the subject's assessment to \$44,150, which would reflect the purchase price with a multiplier of 8.83% applied.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total combined assessment for the subject of \$57,630. The subject's assessment reflects a market value of \$576,300 or \$242.75 per square foot of living area, land included, when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted a sales analysis based on 58 sales within the subject's 245-unit condominium, including the subject's sale reported by the appellant. The sales occurred from January 2018 to October 2021 for prices ranging from \$100,000 to \$585,000, with an aggregate sale price of \$13,744,900. These properties have a combined interest of 23.6240%. Based on these sales, a total value for the condominium of \$58,181,933 was calculated. The board of review computed a value for the subject of \$603,347 based on a 1.0370% interest in the common elements of the condominium. Based on this evidence the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The appellants contend 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.Adm.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.Adm.Code §1910.65(c). The Board finds the appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The appellants presented evidence of a May 2019 sale of the subject and the board of review presented a sales analysis based on 58 sales, including the subject's sale, in support of their respective positions before the Board. The Board gives less weight to the subject's May 2019 sale as it did not occur as proximate in time to the assessment date. The Board also gives less weight to the sales analysis presented by the board of review, which relies on sales occurring in 2018 and 2019, which also did not occur as proximate in time to the assessment date as the other sales in this record.

The Board finds the best evidence of market value to be the thirty sales presented in the sales analysis that occurred in 2020 and 2021. These properties sold for prices ranging from \$100,000 to \$585,000, with an aggregate sale price of \$7,691,000, and have a combined interest of 13.1190%. Based on these sales, the Board calculates a market value for the subject's condominium of \$58,624,895 and a market value for the subject of \$607,940 based on its

combined 1.0370% interest in the common elements of the condominium. The subject's assessment reflects a market value of \$576,300 or \$242.75 per square foot of living area, including land, which is below this estimated value for the subject. Based on this record, the Board finds 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: March 18, 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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