



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

APPELLANT: Neha & Parin Desai Knowhere 1713 LLC and
DOCKET NO.: 21-58139.001-R-1
PARCEL NO.: 28-14-413-011-0000

The parties of record before the Property Tax Appeal Board are Neha & Parin Desai Knowhere 1713 LLC and, the appellant, by attorney Jennifer Truong of Behrens & Truong LLC 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: \$7,986
IMPR.: \$2,014
TOTAL: \$10,000

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a favorable 2020 Final Administrative Decision of the Property Tax Appeal Board pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) in order to challenge 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 two-story apartment building of frame and masonry exterior construction with 3,222 square feet of living area. The building is approximately 92 years old. Features of the building include a partial unfinished basement, a fireplace and three apartment units. The property has an approximately 39,930 square foot site and is located in Markham, Bremen Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on March 10, 2020 for a price of \$100,000. The appellant completed Section IV–Recent Sale Data of the appeal petition indicating the subject property was purchased from Lior & Ruth Coresh, the parties to the transaction were not related, the property was sold through a realtor and had been advertised for

sale since August 2019. To document the sale the appellant provided a copy of the closing statement indicating a sale date of March 11, 2020 and reiterating the purchase price. The appellant also submitted interior and exterior photographs of the subject property, as well as computer generated printouts, as well as a printout from the Redfin website that depicted listing and sales information regarding the subject property. 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 \$16,500. The subject's assessment reflects a market value of \$165,000 or \$51.21 per square foot of building area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable properties located in either Midlothian or Tinley Park, none of which have the same assessment neighborhood code as the subject. The comparables are class 2-11 properties that are improved with two-story buildings of masonry or frame and masonry exterior construction ranging in size from 2,416 to 3,984 square feet of building area. The buildings are 41 or 42 years old. Three comparables each have a full or partial basement and one comparable has a concrete slab foundation. Two comparables have central air conditioning and one comparable has a two-car garage. The comparables sold from October 2020 to August 2021 for prices ranging from \$265,000 to \$450,000 or from \$97.25 to \$112.95 per square foot of living area, including land. The board of review also reported the purchase of the subject property in March 2020 for \$100,000 or \$31.04 per square foot of building area, including land.

The board of review asserted that the appellant's appeal was based on sales comparables but submitted no comparables, whereas the board of review comparables sold for a greater price per square foot than the subject's estimated market value as reflected by the assessment. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In written rebuttal, counsel for the appellant argued that "the board of review submission in this appeal (21-58139) consists of a completed Notes on Appeal Form for PIN 28-14-413-011-0000 which includes the assertion "Appellant requested SALES COMPS." Contrary to the board of review's assertion, the appellant filed a direct appeal from the 2020 PTAB decision (2020-42688) and filed based on "Recent Sale – Section IV." The appellant requests a 2021 total assessment of \$10,000 (FMV of \$100,000).

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

The appellant submitted evidence of the purchase of the subject property in March 2020 for a price of \$100,000 and the board of review submitted four comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given less weight to the comparable sales submitted by the board of review, which are each located in a different city than the subject and each building is significantly newer in age, when compared to the subject building.

The Board finds the best evidence of market value to be the purchase of the subject property. The appellant provided evidence demonstrating the sale had the elements of an arm's length transaction. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the parties to the transaction were not related, the property was sold using a realtor, and the property had been advertised on the open market. In further support of the transaction the appellant submitted a copy of the closing statement. The Board finds the purchase price is below the market value reflected by the assessment. The Board finds the board of review did not present any evidence to challenge the arm's length nature of the transaction or to refute the contention that the purchase price was reflective of market value. Moreover, the board of review confirmed the sale date and sale price of the subject property. Based on this record the Board finds the subject property had a market value of \$100,000 as of January 1, 2021. Since market value has been determined, the level of assessments for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply.

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:

November 25, 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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Neha & Parin Desai Knowhere 1713 LLC and, by attorney:
Jennifer Truong
Behrens & Truong LLC
53 West Jackson Boulevard
Suite 962
Chicago, IL 60604

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602