

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Ketukumar R. Amin DOCKET NO.: 22-20651.001-R-1 PARCEL NO.: 01-13-304-018-0000

The parties of record before the Property Tax Appeal Board are Ketukumar R. Amin, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, Ltd. 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 <u>A Reduction</u> 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: \$28,326 **IMPR.:** \$49,874 **TOTAL:** \$78,200

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 2022 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 2-story Colonial style dwelling of frame and masonry exterior construction with 5,070 square feet of living area that is approximately 20 years old. Features of the home include a basement with finished area, central air conditioning, one fireplace and a 4-car garage. The property has an approximately 40,467 square foot site and is located in Inverness, Barrington Township, Cook County. The subject is classified as a class 2-09 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 an appraisal estimating the subject property had a market value of \$782,000 as of January 1, 2022. The appraisal was prepared by Garry Nusinow, a Certified General Real Estate Appraiser. The intended use of the appraisal was to provide a basis for the appeal of the subject's ad valorem property tax assessment.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting four comparable sales located from 0.52 to 0.89 of a mile from the subject property. The comparables have sites that range in size from 40,768 to 57,020 square feet of land area and are improved with 2-story dwellings with masonry or frame and masonry exterior construction ranging in size from 4,639 to 5,425 square feet of living area. The homes range in age from 27 to 32 years old. Each comparable has a basement with finished area and three of the basements are walk-out in design. Each dwelling has central air conditioning, one to four fireplaces and a 3-car or a 4-car garage. The comparables sold from September 2020 to May 2022 for prices ranging from \$710,000 to \$830,000 or from \$149.85 to \$160.59 per square foot of living area, land included.

After adjusting comparable #4 for date of sale/time, the appraiser adjusted the comparables for differences with the subject arriving at adjusted prices ranging from \$743,000 to \$817,000 and an opinion of market value for the subject of \$782,000. Based on this evidence, the appellant requested the subject's assessment be reduced to reflect the appraised value when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$89,765. The subject's assessment reflects a market value of \$897,650 or \$177.05 per square foot of living 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 comparables located in the same assessment neighborhood code as the subject, one of which is located approximately ¼ of a mile from the subject and three of which are located in South Barrington. The comparables have sites that range in size from 21,912 to 74,527 square feet of land area and are improved with 2-story class 2-09 dwellings of masonry or frame and masonry exterior construction that range in size from 5,002 to 5,694 square feet of living area. The homes range in age from 4 to 10 years old. Each comparable has a basement, with one having finished area. Each dwelling has central air conditioning, one or three fireplaces and a 3-car or a 4-car garage. The comparables sold from November 2019 to August 2021 for prices ranging from \$940,000 to \$1,350,000 or from \$187.92 to \$237.34 per square foot of living area, land included. Based on this evidence, the board of review requests the subject's assessment be confirmed.

In rebuttal, the appellant submitted a brief including commentary and maps depicting driving distance from the subject to board of review's comparables #2, #3 and #4. The appellant argued the appraiser completed a detailed interior and exterior inspection of the subject property and adjusted comparable sales in accordance with the Uniform Standards of Professional Appraisal Practice in arriving at the final opinion of value for the subject property. In contrast, the board of review submitted unadjusted raw sales. Appellant's counsel argued the board of review did not

¹ The appraiser describes the comparables as colonial, traditional, French Provincial or Georgian style dwellings. Photographs of the comparable properties depict the dwellings to be 2-story homes.

comment on any of the appraiser's comparable sales. The appellant critiqued the board of review comparables arguing comparable #1 sold in 2019 and is 13 years newer than the subject and that board of review comparables #2, #3 and #4 are each located approximately four miles from the subject and are from 10 to 16 years newer in age when compared to 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 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 appraisal submitted by the appellant. The appraiser selected comparable sales generally similar to the subject in location, age, site size, dwelling size and other features and made reasonable adjustments to the comparables for differences from the subject. The board of review submitted comparables which differ from the subject in location, age, site size and basement finished area. The subject's assessment reflects a market value of \$897,650 or \$177.05 per square foot of living area, including land, which falls above the appraised value. The Board finds the subject property had a market value of \$782,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% shall apply. (86 Ill.Admin.Code §1910.50(c)(2).

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.

2	1. Fen
	Chairman
CAR .	
Member	Member
Dan Dikinin	Swah Bokley
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:	September 16, 2025
	Middle 14

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 <u>PETITION AND EVIDENCE</u> 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

Ketukumar R. Amin, by attorney: Scott Shudnow Shudnow & Shudnow, Ltd. 77 West Washington Street Suite 1620 Chicago, IL 60602

COUNTY

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