



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

APPELLANT: Abbas Rampurwala
DOCKET NO.: 22-21799.001-R-1
PARCEL NO.: 01-34-203-006-0000

The parties of record before the Property Tax Appeal Board are Abbas Rampurwala, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, 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 **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:

LAND: \$19,797
IMPR.: \$88,202
TOTAL: \$107,999

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 dwelling of masonry exterior construction with 7,323 square feet of living area and is approximately 38 years old. Features include a full basement with finished area, five full bathrooms, one-half bathroom, central air conditioning, five fireplaces, and a 3-car garage. The board of review indicated the subject had other improvements, but did not provide any additional details. The property has a 65,993 square foot site and is located in South Barrington, 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 assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information, including property characteristics printouts which were analyzed to verify/update data in the Section V grid

analysis, on five equity comparables with the same assessment neighborhood code as the subject. The comparables are improved with 2-story, class 2-09 dwellings of masonry or frame and masonry exterior construction ranging in size from 5,864 to 8,173 square feet of living area. The dwellings range in age from 33 to 55 years old. Each comparable has a full basement with two of these having finished area, from two to five full bathrooms, from one to three half bathrooms, central air conditioning, from one to three fireplaces, and from a 2.5-car to a 4-car garage. The comparables have improvement assessments ranging from \$52,608 to \$64,000 or from \$7.79 to \$8.97 per square foot of living area. Based on this evidence, the appellant requested that the improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$107,999. The subject property has an improvement assessment of \$88,202 or \$12.04 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four equity comparables with the same assessment neighborhood code as the subject and located ¼ of a mile from the subject property. The comparables are improved with 2-story, class 2-09 dwellings of masonry or frame and masonry exterior construction ranging in size from 5,946 to 6,621 square feet of living area. The dwellings range in age from 25 to 28 years old. The comparables each have a full basement with three of these having finished area, from three to seven full bathrooms with three of these comparables also having two half bathrooms, central air conditioning, either three or four fireplaces, and a 4-car garage. The comparables have improvement assessments ranging from \$60,746 to \$88,060 or from \$9.37 to \$14.81 per square foot of living area. Based on this evidence, the board of review requested the assessment be confirmed.

Conclusion of Law

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted nine suggested comparables for the Board's consideration. The Board gives less weight to the appellant's comparables #1, #2, and #5 as well as board of review comparables #1 and #4 which differ substantially from the subject in dwelling size and/or lack basement finish, which the subject features.

The board finds the best evidence of assessment equity to be the appellant's comparables #3 and #4 as well as board of review comparables #2 and #3 which are relatively similar to the subject in location, design/class, age, and dwelling size with varying degrees of similarity in bathroom count and other features. These comparables have improvement assessments ranging from \$58,231 to \$76,234 or from \$8.92 to \$11.77 per square foot of living area. The subject's

improvement assessment of \$88,202 or \$12.04 per square foot of living area falls above the range established by the best comparables in this record. However, the subject's higher improvement assessment appears logical when considering its larger dwelling size and/or bathroom count when compared to the best comparables. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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

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: June 17, 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

Abbas Rampurwala, by attorney:
Dora Cornelio
Schmidt Salzman & Moran, Ltd.
111 W. Washington St.
Suite 1300
Chicago, IL 60602

COUNTY

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