



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

APPELLANT: Shah Hemant TR  
DOCKET NO.: 22-24591.001-R-1  
PARCEL NO.: 07-23-207-003-0000

The parties of record before the Property Tax Appeal Board are Shah Hemant TR, the appellant, by Brian P. Liston, attorney-at-law of the Law Offices of Liston & Tsantilis, P.C. 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:** \$14,397  
**IMPR.:** \$51,239  
**TOTAL:** \$65,636

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 is improved with a two-story dwelling of frame construction containing 3,546 square feet of living area. The dwelling is approximately 31 years old. Features of the property include a full unfinished basement, central air conditioning, one fireplace, 3½ bathrooms, and a 2-car garage. The property has a 10,284 square foot site located in Schaumburg, Schaumburg Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellant submitted information on three equity comparables consisting of class 2-78 properties improved with dwellings of frame or frame and masonry exterior construction that range in size from 3,546 to 3,644 square feet of living area. The homes are either 31 or 34 years old. Each comparable has central air conditioning, one or

two fireplaces, two or three full bathrooms, one or two half bathrooms, and a 2-car or 3-car garage. The documentation provided by the appellant disclosed comparables #1 and #2 each have a full basement. The appellant did not provide any documentation regarding whether comparable #3 has a basement. Only comparable #3 has the same assessment neighborhood code as the subject property. The comparables are located either .1 of a mile or .9 of a mile from the subject property. Their improvement assessments range from \$41,380 to \$49,857 or from \$11.36 to \$14.06 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$51,239.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$65,636. The subject property has an improvement assessment of \$51,239 or \$14.45 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 composed of class 2-78 properties improved with two-story dwellings of frame construction that have either 3,310 or 3,546 square feet of living area. The homes are 31 or 32 years old. Each property has a full unfinished basement, central air conditioning, one fireplace, 2½ or 3½ bathrooms, and a 2-car or 3-car garage. The comparables have the same assessment neighborhood code as the subject property and are located ¼ of a mile from the subject. Their improvement assessments range from \$48,161 to \$52,776 or from \$14.55 to \$14.88 per square foot of living area.

### **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 information on seven equity comparables to support their respective positions. The Board gives less weight to appellant's comparables #1 and #2 due to differences from the subject in location, each having a different assessment neighborhood than the subject and located approximately .9 of a mile from the subject property. The five remaining comparables, appellant's comparable #3 and the board of review comparables, are similar to the subject in location, age, size, and most features. These five comparables have improvement assessments that range from \$48,161 to \$52,776 or from \$14.06 to \$14.88 per square foot of living area. The subject's improvement assessment of \$51,239 or \$14.45 per square foot of living area falls within the range established by the best comparables in this record. Based on this record 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: February 17, 2026



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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