

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Berooz Afshar
DOCKET NO.: 22-33541.001-R-1
PARCEL NO.: 02-23-209-007-0000

The parties of record before the Property Tax Appeal Board are Berooz Afshar, the appellant, by Kyle Gordon Kamego, attorney-at-law of Robert H. Rosenfeld & Associates, LLC in Northbrook, 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:** \$6,804 **IMPR.:** \$58,196 **TOTAL:** \$65,000

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 3,749 square feet of living area. The dwelling is approximately 16 years old. Features of the home include a full unfinished basement, central air conditioning, one fireplace, 4½ bathrooms, and a 2-car garage. The property has a 11,340 square foot site located in Palatine, Palatine 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 four equity comparables composed of class 2-78 properties improved with two-story dwellings of frame exterior construction that range in size from 2,923 to 3,608 square feet of living area. The homes range in age from 15 to 35 years old. Each property has a full or partial basement, central air

conditioning,  $2\frac{1}{2}$  or  $3\frac{1}{2}$  bathrooms, and a 2-car or  $2\frac{1}{2}$ -car garage. Two of the comparables each have one fireplace. The comparables have the same assessment neighborhood code as the subject property and are located from .3 to 1.7 miles from the subject property. The comparables have improvement assessments that range from \$37,947 to \$53,850 or from \$12.98 to \$14.93 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$52,636.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$65,000. The subject property has an improvement assessment of \$58,196 or \$15.52 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on three equity comparables composed of class 2-78 properties improved with two-story dwellings of frame exterior construction that range in size from 3,091 to 3,504 square feet of living area. The homes are 8 or 18 years old. Each property has a full basement, central air conditioning, 3½ bathrooms, and a 2-car or 3-car garage. Comparable #1 has one fireplace. The comparables have the same assessment neighborhood code as the subject and are located ¼ of a mile from the subject property. Their improvement assessments range from \$57,196 to \$61,196 or from \$16.32 to \$19.16 per square foot of living area. The board of review contends the building assessed value per square foot for the comparables are the same or higher than the subject, which supports the assessed value as equitable.

## **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 with the same classification code and neighborhood code as the subject property to support their respective positions. The Board gives less weight to appellant's comparable #1 due to differences from the subject dwelling in age and size. The Board gives less weight to board of review comparables #2 and #3 due to differences from the subject dwelling in age and size. The Board finds the best evidence of assessment equity to be appellant's comparables #2, #3 and #4 as well as board of review comparable #1 that range in age from 15 to 22 years old and in size from 3,504 to 3,608 square feet of living area. Each comparable is improved with a dwelling that is smaller than the subject home indicating each comparable would require an upward adjustment to make the property more equivalent to the subject in size. Each comparable has one or two less bathrooms than the subject indicating each would require an upward adjustment to make the property more equivalent to the subject for this difference. Appellant's comparables #2 and #4 have no fireplace, unlike the subject, necessitating upward adjustments to make these properties more equivalent to the subject for this dissimilarity. Conversely, appellant's comparables #2 and #3 have larger garages than the subject suggesting downward adjustments would be appropriate for

this difference. These four comparables have improvement assessments that range from \$47,294 to \$57,196 or from \$13.36 to \$16.32 per square foot of living area. The subject's improvement assessment of \$58,196 or \$15.52 per square foot of living area falls above the overall improvement assessment range but is within the range on a per square foot of living area basis as established by the best comparables in this record. Based on this record, after considering the appropriate adjustments to the comparables due to differences from the subject in dwelling size and features, 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.

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	Chairman
C. R.	Sobot Stoffen
Member	Member
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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
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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**

Berooz Afshar, by attorney: Kyle Gordon Kamego Robert H. Rosenfeld & Associates, LLC 40 Skokie Blvd Suite 150 Northbrook, IL 60062

## **COUNTY**

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