

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Sami Safa Property, LLC

DOCKET NO.: 22-38453.001-R-1 PARCEL NO.: 13-01-217-033-0000

The parties of record before the Property Tax Appeal Board are Sami Safa Property, LLC, the appellant, by attorney William I. Sandrick, of Sandrick Law Firm, LLC, in Homewood, 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: \$12,375 **IMPR.:** \$37,625 **TOTAL:** \$50,000

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 consists of a three-story multi-family building of masonry exterior construction with 6,670 square feet of gross building area which is approximately 94 years old. Features include a full basement, central air conditioning, 4 full bathrooms, and a two-car garage. The property has a 4,125 square foot site and is located in Chicago, Jefferson 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 December 8, 2022 for a price of \$500,000. The appellant completed Sec. IV – Recent Sale Data reporting the property was purchased from an LLC and the parties to the transaction were unrelated corporations. The property was sold through a realtor and was advertised with an online listing for a period of 319

days. The brief supplied by counsel refers to the listing as part of "MLS # 11620658." The property was not sold due to a foreclosure action and was not sold using a contract for deed. In further support of the purchase price, the appellant supplied a copy of the Settlement Statement reiterating the date of purchase and the sale price. Furthermore, the document depicts the distribution of commissions to Century 21 and Berkshire Hathaway. A computer screen print of the recorded Warranty Deed for the property was also submitted along with printouts depicting the sale of the subject for \$500,000. 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 \$72,865. The subject's assessment reflects a market value of \$728,650 or \$109.24 per square foot of gross building area, land included, when using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted information on two comparable sales located in the subject's neighborhood code and ¼ of a mile from the subject. The parcels contain 4,092 and 4,125 square feet of land area and are each improved with a class 2-11 three-story multi-family building of masonry exterior construction. The buildings are each 94 years old and contain 5,866 and 6,081 square feet of gross building area, respectively. The buildings each have full basements, 4 full bathrooms, central air conditioning and a two-car and a three-car garage, respectively. The properties sold in January and March 2022 for prices of \$830,000 and \$950,000 or for \$136.49 and \$161.95 per square foot of gross building area, including land.

As part of the grid analysis, the board of review depicted that the subject property sold in December 2022 for a price of \$500,000 or \$74.96 per square foot of gross building area, including land.

Based on the foregoing evidence, the board of review requested confirmation of the subject's assessment.

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 purchase of the subject property in December, 2022 for a price of \$500,000. 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, the property had been advertised on the open market on the Internet and it had been on the market for 319 days. In further support of the transaction, the

appellant submitted a copy of the settlement statement. The Board finds the purchase price of \$500,000 is below the market value reflected by the assessment of \$728,650. 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. Given the reported sale price of the subject in close proximity to the lien date of January 1, 2022, the Board has given little weight to the two comparable sales presented by the board of review.

Based on this record, the Board finds the subject property had a market value of \$500,000 as of January 1, 2022. Since market value has been determined 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). Therefore, a reduction in the subject's assessment commensurate with the appellant's request is appropriate.

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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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:	August 19, 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

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COUNTY

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