



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

APPELLANT: Siddarth Chhabria
DOCKET NO.: 22-43434.001-R-1
PARCEL NO.: 14-29-316-029-0000

The parties of record before the Property Tax Appeal Board are Siddarth Chhabria, the appellant, by attorney Michael Elliott, of Elliott & Associates Attorneys, PLLC in Des Plaines; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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: \$90,000
IMPR.: \$172,700
TOTAL: \$262,700

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 property is a 6,000 square foot site located in Chicago, Lakeview Township, Cook County. The subject is classified as a class 2-08 property under the Cook County Real Property Assessment Classification Ordinance. The subject improvement is an approximately 27-year-old, two-story dwelling of masonry construction with 4,428 square feet of living area. Features of the dwelling include six bathrooms, a partial basement, air-conditioning, and a three and a half-car garage.

The appellant contends assessment inequity, contention of law, and recent sale as the bases of the appeal. In support of the equity argument the appellant submitted information on seven equity comparable properties. The comparable properties are in the same neighborhood and within 0.47 miles of the subject. They range in age from 11 to 31 years; in size from 4,053 to 4,794 square

feet of living area; and have improvement assessment from \$19.90 to \$26.76 per square foot of living area. The appellant requested the subject's total assessment be reduced to \$195,829.

In support of the overvaluation argument, the appellant submitted evidence disclosing that the subject property was purchased on November 12, 2021, for a price of \$2,675,000. The appellant completed Section IV - Recent Sale Data of the appeal disclosing the subject was sold by a realtor, was advertised for sale on a multiple listing service for 73 days, was not sold due to foreclosure action or using a contract for deed, and the sale parties were not related. The appellant also provided a master settlement statement documenting the sale of the subject. The appellant argued that this arms-length transaction is conclusive evidence of a market value, and in their brief supporting their contention of law requested a reduction in the subject's assessment to reflect the purchase price assessed at no more than 8.83% of market value based on a recent sale ratio study performed by the Illinois Department of Revenue concluding that Cook County experienced a three-year median level of assessment of 8.83% of recent sales prices.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$267,500. The subject property has an improvement assessment of \$177,500 or \$40.09 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on seven¹ equity comparable properties. The suggested comparable properties are in the same neighborhood and within a quarter mile or in the same subarea as the subject. The comparable properties range in age from 1 to 25 years; in size from 4,028 to 4,814 square feet; and have improvement assessments ranging from \$30.00 to \$65.17 per square foot of living area. The board of review requested that the assessment be confirmed.

The matter was set for hearing February 5, 2026, but prior to that date the parties waived hearing and requested the Board to decide the appeal on the evidence submitted.

Conclusion of Law

The taxpayer contends recent sale market value/overvaluation, contention of law, and assessment inequity as the bases of the appeal.

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).

When based upon a contention of law, Section 10-15 of the Illinois Administrative Procedure Act (5- ILCS 100/10-15) provides: Standard of proof. Unless otherwise provided by law or stated in the agency's rules, the standard of proof in any contested case hearing conducted under this Act by an agency shall be the preponderance of the evidence. The rules of the Property Tax Appeal Board are silent with respect to the burden of proof associated with an argument founded on a contention of law. See 86 Ill.Admin.Code §1910.63.

¹ The same parcel was listed twice.

Regarding overvaluation, the Board gives no weight to the appellant's median level of assessment argument as it is unsupported. Therefore, as conceded by the appellant, the November 12, 2021, sale for a price of \$2,675,000 is conclusive evidence of market value as it has all the earmarks of a sale between a willingly buyer and a willing seller and the board of review did not present any evidence to challenge the arm's length nature of the transaction.

The taxpayer also 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). Clear and convincing evidence means more than a preponderance of the evidence, but it does not need to approach the degree of proof needed for a conviction of a crime. Bazyldo v. Volant, 164 Ill. 2d 207, 213 (1995).

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 comparable properties to the subject property. 86 Ill.Admin.Code §1910.65(b). The Illinois Constitution requires that real estate taxes "be levied uniformly by valuation ascertained as the General Assembly shall provide by law." Ill. Const., art. IX, § 4 (1970); Walsh v. Property Tax Appeal Board, 181 Ill. 2d 228, 234 (1998). This uniformity provision of the Illinois Constitution does not require absolute equality in taxation, however, and it is sufficient if the taxing authority achieves a reasonable degree of uniformity. Peacock v. Property Tax Appeal Board, 339 Ill. App. 3d 1060, 1070 (4th Dist. 2003).

The Board finds the appellant did meet this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence of assessment equity to be appellant's comparable properties #5 and #6 and the board of review comparable properties #2, #3, and #4. These comparable properties had improvement assessments that ranged from \$25.30 to \$39.26 per square foot of living area. The subject's improvement assessment of \$40.09 per square foot of living area falls above the range established by the best comparable properties in this record. After considering all the best comparable properties submitted by the parties with emphasis on those properties that are proximate in location, similar in size of living area, and with similar features to the subject and after further considering adjustments to the best comparable properties for differences from the subject, the Board finds the appellant did demonstrate to the level of clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is 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



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:

April 21, 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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