

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Syeda Gavina
DOCKET NO.: 22-47911.001-R-1
PARCEL NO.: 10-27-422-023-0000

The parties of record before the Property Tax Appeal Board are Syeda Gavina, the appellant, by Dora Cornelio, attorney-at-law 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: \$7,576 IMPR.: \$27,824 TOTAL: \$35,400

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 one-story dwelling of frame and masonry exterior construction with 1,176 square feet of living area. The dwelling is approximately 68 years old. Features of the property include a basement, central air conditioning, 1½ bathrooms, and a 2.5-car garage. The property has a 5,412 square foot site located in Lincolnwood, Niles Township, Cook County. The subject is classified as a class 2-03 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 five equity

¹ The appellant described the subject as having a full unfinished basement while the board of review described the subject as having a partial basement with a recreation room. Neither party provided additional documentation to support their description of the basement.

comparables composed of class 2-03 properties improved with 1-story or 1.5-story dwellings of frame, masonry or frame and masonry exterior construction that range in size from 1,152 to 1,290 square feet of living area. The dwellings range in age from 67 to 100 years old. Each property has a full basement with four having finished area, and 1 or 1½ bathrooms. Three comparables have central air conditioning and one comparable has a 4-car garage. The comparables have improvement assessments ranging from \$21,000 to \$24,912 or from 18.23 to \$19.51 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$22,708.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$35,401. The subject property has an improvement assessment of \$27,824 or \$23.66 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 2-03 properties improved with one-story dwellings of frame and masonry exterior construction that range in size from 1,179 to 1,438 square feet of living area. The homes range in age from 67 to 69 years old. Each property has a partial basement with one having finished area, one or two bathrooms, and a 2-car garage. Two comparables have central air conditioning. These properties have the same assessment neighborhood code as the subject and are located in the same block or ¼ of a mile from the subject. These properties have improvement assessments that range from \$30,423 to \$35,475 or from \$24.67 to \$25.80 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 eight 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 in age. The Board gives less weight to appellant's comparable #4 and #5 as neither comparable has central air conditioning and a garage, which are features of the subject property. The Board gives less weight to board of review comparable #3 due to differences from the subject in dwelling size. The Board gives most weight to appellant's comparables #2 and #3 as well as board of review comparables #1 and #2 that have dwellings ranging in size from 1,179 to 1,290 square feet of living area and in age from 68 to 72 years old. Appellant's comparables #2 and #3 require upward adjustments as neither property has a garage which is a feature of the subject property. Board of review comparable #2 has no central air conditioning, unlike the subject property, requiring an upward adjustment to make the property more equivalent to the subject property for this difference. Additionally, board of review comparables #1 and #2 have smaller garages than the subject requiring up adjustments for this dissimilarity. These comparables have improvement assessments that range from \$23,125 to \$30,938 or from \$18.44 to \$25.80 per

square foot of living area. Board of review comparables #1 and #2 are most similar to the subject in location with improvement assessments of \$30,938 and \$30,423 or \$25.11 and \$25.80 per square foot of living area, respectively. The subject's improvement assessment of \$27,824 or \$23.66 per square foot of living area falls within the range established by the best comparables in this record and is below the two comparables most similar to the subject in location. Based on this record, after considering the appropriate adjustments to the comparables, 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
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Member	Member
Dan De Kinin	Swan Bokley
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
	Middle 15
	Clerk of the Property Tax Appeal Board

Section 16-185 of the Property Tax Code provides in part:

IMPORTANT NOTICE

"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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