



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

APPELLANT: Nizamuddin Mohammed
DOCKET NO.: 22-50242.001-R-1
PARCEL NO.: 10-23-134-052-0000

The parties of record before the Property Tax Appeal Board are Nizamuddin Mohammed, the appellant, by attorney Abby L. Strauss, of Schiller Law 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: \$7,091
IMPR.: \$48,908
TOTAL: \$55,999

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 two-story dwelling of masonry exterior construction with approximately 2,475 square feet of living area.¹ The dwelling is approximately 21 years old with a reported effective age of 10 years. Features of the home include a full walkout-style partially finished basement, central air conditioning, a whirlpool tub, and a two-car garage. The property has a 5,253 square foot site and is located in Skokie, Niles Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

¹ The appellant's appraiser, based on measurements, included a schematic drawing to support the size determination. In contrast, the board of review reported 2,600 square foot living area with no support. On this record, the Property Tax Appeal Board finds the best and most supported dwelling size evidence was supplied by the appellant.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal prepared for the client LendLink Financial Inc. in relation to a purchase transaction.² The report was prepared by Ronald L. Holstein, a Certified Residential Real Estate Appraiser, estimating the subject property had a market value of \$498,380 as of June 11, 2020.³ The appraiser reported having analyzed the 12-page purchase contract which concerned the REO sale and was characterized as a “typical REO transaction.” The owner at the time was US Bank trust NA as trustee for LSF9 master participation Trust. The subject was described as having no updates in the prior 15 years and with no deferred maintenance noticed. Although the cost approach, depicting a land only site value of \$211,000, was part of the appraisal, the appraiser placed primary emphasis on the sales comparison approach.

The appraiser previously inspected the subject property on March 7, 2019 in connection to a report dated March 11, 2019.

Holstein wrote, “land to overall property value is MORE THAN 30% of the appraised value.” Any impact on marketability was reflected in the final value conclusion “as most comparable sales have similar ratios and this IS TYPICAL for this market.” [Capitalization in original.] Also as part of the addendum, the appraiser reported area lot sizes vary between a smaller lot of 1,000 square feet to a larger lot of 10,000 square feet. He also reported the subject parcel is a typical size for the area. Neither functional nor external obsolescence were found in the property.

In the sales comparison approach, Holstein selected four sales and two active listings located in Skokie which were from .07 to .50 of a mile from the subject. The comparable sites range in size from 5,196 to 7,380 square feet of land area and are improved with two-story “Georgian” or “Colonial” dwellings. The subject has a Q4 overall quality of construction with the comparables having either Q3 or Q4 ratings. The homes range in age from 13 to 74 years old. The homes range in size from 1,612 to 3,869 square feet of living area. The comparables each have a basement with finished area. Features include 2½, 3 or 3½ bathrooms, central air conditioning, and a one-car, two-car or three-car garage. Four comparables have one or two fireplaces. The four properties sold from September 2018 to March 2020 for prices ranging from \$409,000 to \$603,000 or from \$221.95 to \$253.72 per square foot of living area, including land. Comparables #5 and #6 depict active listing prices of \$550,000 and \$643,950 or of \$166.44 and \$215.69 per square foot of living area, including land.

Five of the six comparables depict original list prices ranging from \$450,000 to \$643,950, including land with a range of days on the market from 1 to 170. In this regard, the subject was also depicted as having an April 2020 list price of \$510,000 and 39 days on the market, as shown in the addendum. A listing of the subject from November 2019 depicts an asking price of \$570,000 and 127 days on the market.

Next, the appraiser applied an adjustment to sale #3 for sales concessions and then applied adjustments to the comparables for differences from the subject in site size, quality of

² The addendum further reported ACT Appraisal, Inc. was the client with LendLink being the lender and additional intended user of the report.

³ Inexplicably, the brief accompanying the appeal references an appraisal depicting a market value of \$495,000. As noted herein, the evidence did not comport with the statement in the brief.

construction, bathroom count, size of basement finish, dwelling size, garage capacity, outdoor amenities, and/or fireplace amenity. Based on the adjustment process, the six comparables have adjusted sales prices ranging from \$469,916 to \$547,580.

As part of the Addendum, the appraiser asserted sale #4 had a superior quality of interior construction quality based upon a historical paired sales analysis “between comp 4 and 8727 Harding Ave.”⁴ No actual age adjustments were necessary “due to typical buyers giving greatest weight to effective age which is adjusted in the condition section” further herein. Holstein reported that no condition adjustments were made.

In addition, Holstein wrote that the “subject’s appraised value is MORE THAN 10% HIGHER THAN the predominant market value of all homes in this market due to the subject’s larger than typical size and superior condition.” [Capitalization in original]. The appraiser determined the comparable listing #6 was the most similar to the subject as it required the fewest adjustments in the report. “Comp [sale] #1 was given 100% weight in this analysis because it required the least amount of adjustments of all comparable sales that sold WITHIN 6 months of the appraisal date.”

Based on the foregoing evidence opining a market value for the subject of \$498,380 as of June 11, 2020, the appellant requested that the assessment be reduced to \$49,500 which would reflect a market value of \$495,000.

The board of review submitted its "Board of Review Notes on Appeal." The appellant submitted a copy of the final decision disclosing the total assessment for the subject of \$55,999. The subject's assessment reflects a market value of \$559,990 or \$226.26 per square foot of living area, including land, when using a dwelling size of 2,475 square feet and applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales, none of which is located in the same neighborhood code as the subject property. The comparable parcels range in size from 2,380 to 7,497 square feet of land area. Each comparable is improved with a class 2-78 two-story dwelling of frame, masonry, or frame and masonry exterior construction. The comparables range in age from 6 to 46 years old and the comparables range in size from 2,134 to 3,552 square feet of living area. Each comparable has a full or partial basement, two of which have finished area. Features include 2½ or 3½ bathrooms, central air conditioning, and three comparables each have a two-car garage. Three comparables have one or two fireplaces. The comparables sold from June 2019 to November 2020 for prices ranging from \$560,000 to \$827,500 or from \$179.49 to \$363.17 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject’s assessment.

In rebuttal, the appellant again asserts that the appraisal submitted herein in support of the appeal depicts a market value for the subject of \$495,000. The appellant asserts that the board of review failed to address the subject’s market value in failing to abide by the Property Tax Appeal

⁴ Upon thorough review of the appraisal report, the Board found no property with an address of 8727 Harding Ave.

Board's procedural rules Section 1910.65(c). In addition, the board of review sales data "does not come from a verified source or reflect adjustments for differences in size, location, age, bathroom count, condition, amenities, or date of sale." In light of the foregoing, the appellant argues that the only credible market value evidence before the Property Tax Appeal Board is the appraisal of the subject property presented by the appellant. The rebuttal closes by noting that the board of review comparable sales are "in a different neighborhood than the subject property."

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 did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

As an initial matter, while in rebuttal the appellant cited to 86 Ill.Admin.Code §1910.65(c)(4) of the procedural rules of the Property Tax Appeal Board for the proposition that documentation was "required," the Board finds the rule actually provides in pertinent part that proof of market value **may** consist of one of four differing options, where it is *recommended* that "documentation" of not fewer than three recent sales of suggested comparables be provided with "documentation" of the similarity, proximity and lack of distinguishing characteristics. The Board finds that the Comparable Sales grid analysis supplied by the board of review met the provisions of the cited procedural rule. Furthermore, the Board finds that it was the appellant's opportunity in submission of rebuttal to contradict and/or disprove the factual assertions of the board of review set forth in the grid analysis with contradictory documentation, if any, as to the board of review comparable sales evidence. (See 86 Ill.Admin.Code §1910.66). Instead of addressing the merits of the board of review's comparable sales evidence, the Board finds that the appellant chose to argue failure of the board of review to comply with procedural rules with the submission that was made, thereby waiving any argument that the board of review sales data was inaccurate and/or nonexistent.

On the merits of this appeal, the appellant submitted an appraisal of the subject property related to a purchase transaction with an opinion of value as of June 11, 2020 and the board of review submitted four comparable sales to support their respective positions before the Property Tax Appeal Board. The Board finds the appellant's appraisal has not presented a credible or reliable indication of the subject's market value as of the lien date herein of January 1, 2022 for several reasons. The appraiser utilized three of six sales/listings that occurred in 2018 and 2019, dates where half of the sales were furthest in time to both the lien date at issue and to other sales contained in the record. Moreover, the Board is not persuaded that primary reliance on appraisal sale #1 was warranted based primarily on its March 2020 sale date for a price of \$600,000 that necessitated a \$100,000 downward adjustment for quality of construction as compared to the subject. In addition, this comparable has but a one-car garage as compared to the subject's two-car garage. After adjustments to this property, Holstein reported an adjusted sale price for this property of \$498,380 or identical to the final value opinion of the appraiser for the subject property. Therefore, the Board having determined that the appellant's appraisal lacks credibility

in terms of the opinion of value, the Board will analyze the ten raw sales/listings presented by both parties.

In analyzing the sales in the record, the Board has given little weight to appraisal sales #2, #3 and #4 as well as board of review comparable #3, due to sales dates in 2018 and 2019 as compared to the lien date at issue herein. The Board has given reduced weight to appraisal listing #5 as well as board of review comparables #1 and #2, due to significant differences in dwelling size of approximately 26% to 56%, when compared to the subject's dwelling size.

Therefore, the Property Tax Appeal Board finds the best evidence of market value to be appraisal sale #1 with listing #6 as well as board of review comparable sale #4 which are each relatively similar to the subject in design, foundation type and some features. The sales/listings from the appraisal are 73 and 74 years old, respectively, whereas the subject is 21 years old, which is more similar to the 7 year old age of board of review comparable #4. Each of the best three comparables in the record differ in lot size when compared to the subject necessitating adjustments to make them more equivalent to the subject as well. Adjustments would also be necessary for differences in dwelling size, basement size and/or finished basement area, when compared to the subject. These three best comparables sold/listed from March 2020 to December 2020 for prices/asking prices ranging from \$550,000 to \$648,000 or from \$215.69 to \$278.35 per square foot of living area, including land. The subject's assessment reflects a market value of \$559,990 or \$226.26 per square foot of living area, including land, which is at the low-end of the range established by the best comparable sales/listings in the record both in terms of overall value and on a per-square-foot basis. Given the best market value data in the record and after considering necessary adjustments to the comparables to make them more equivalent to the subject property, the Board finds the subject property is not over assessed based on its estimated market value and a reduction in the subject's assessment is not warranted.

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: _____

October 21, 2025



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Nizamuddin Mohammed, by attorney:
Abby L. Strauss
Schiller Law P.C.
33 North Dearborn
Suite 1130
Chicago, IL 60602

COUNTY

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