

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Kamran Investments, LLC

DOCKET NO.: 22-52356.001-R-1 through 22-52356.002-R-1

PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Kamran Investments, LLC, the appellant, by attorney Dora Cornelio, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
22-52356.001-R-1	19-35-205-001-0000	3,024	17,976	\$21,000
22-52356.002-R-1	19-35-205-002-0000	2,160	11,840	\$14,000

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 two parcels improved with a 2-story, multi-family building of masonry exterior construction with 4,338 square feet of gross building area. The building is approximately 44 years old. Features include a full basement¹ and four full bathrooms. The property has a 3,780 square foot site and is located in Chicago, Lake Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

¹ Both parties disclosed the subject has a full basement with the appellant reporting it to be finished with a recreation room while the board of review reports it to be unfinished.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellant submitted information on four² equity comparables with the same assessment neighborhood code as the subject. The comparables are improved with 2-story, class 2-11 multi-family buildings of masonry exterior construction ranging in size from 2,504 to 5,645 square feet of gross building area. The buildings range in age from 55 to 63 years old. Each comparable has a full basement with finished area and from two to six full bathrooms. One comparable has central air conditioning. Three comparables each have a 1-car or a 2-car garage. The comparables have improvement assessments ranging from \$3,340 to \$9,840 or from \$1.33 to \$1.77 per square foot of gross building area. Based on this evidence, the appellant requested that the subject's improvement be reduced to \$24,632 or \$5.68 per square foot of gross building area.

The appellant's submission included a copy of the "Cook County Board of Review" final decision dated August 16, 2023 which disclosed the subject has a total assessment for the two parcels of \$35,000. The "Addendum to Petition" disclosed the subject's total assessment reflects a total land assessment of \$5,184 and a total improvement assessment of \$29,816 or \$6.87 per square foot of gross building area.

The board of review submitted its "Board of Review Notes on Appeal" for only one parcel under appeal. In support of its contention of the correct assessment, the board of review submitted information on four comparables that are located in the subject's assessment neighborhood code. The comparables are improved with 2-story or 3-story, class 2-11 multi-family buildings of masonry exterior construction ranging in size from 2,810 to 5,242 square feet of gross building area. The buildings range in age from 28 to 59 years old. Three comparables each have a full basement with finished area and one comparable has a crawl space foundation. Each comparable has from two to six full bathrooms and one comparable also has two half bathrooms. One comparable has a 2-car garage. The comparables have improvement assessments ranging from \$29,832 to \$37,855 or from \$7.22 to \$10.62 per square foot of gross building area. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 eight suggested equity comparables for the Board's consideration with each having varying degrees of similarity to the subject in property characteristics. The appellant's comparables are each substantially older buildings than the subject, three of these

² The Board finds comparables #4 and #5 to be the same property as the address and physical characteristics for both property index numbers (pins) are the same. This comparable will be referred to as comparable #4.

comparables differ substantially from the subject in gross building size, and three comparables feature a garage amenity, unlike the subject. The board of review comparables each differ substantially from the subject in gross building size, three comparables differ substantially from the subject in age, one comparable lacks a basement foundation, which the subject features, and one comparable has a garage amenity, unlike the subject. The parties' comparables would each require appropriate adjustments for two or more of the aforementioned differences, as well as others, in order to make them more equivalent to the subject. Nevertheless, the parties' comparables have improvement assessments ranging from \$3,340 to \$37,855 or from \$1.33 to \$10.62 per square foot of living area. The subject's improvement assessment of \$29,816 or \$6.87 per square foot of living area falls within the range established by the comparables in this record. Based on the equity evidence in this record, the Board finds a reduction in the subject's assessment is not supported.

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
a R	Sobert Stoffen
Member	Member
Dan Dikini	Sarah 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:	July 15, 2025		
	111-11716		
	Mand		
	Clade of the December Town Associal December		

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

Kamran Investments, LLC, by attorney: Dora Cornelio Schmidt Salzman & Moran, Ltd. 111 W. Washington St. Suite 1300 Chicago, IL 60602

COUNTY

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