



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

APPELLANT: Nilesh Khot
DOCKET NO.: 23-20198.001-R-1
PARCEL NO.: 06-04-208-032-0000

The parties of record before the Property Tax Appeal Board are Nilesh Khot, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, 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 **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: \$9,094
IMPR.: \$34,106
TOTAL: \$43,200

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 2023 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 2-story dwelling of frame exterior construction with 3,393 square feet of living area. The dwelling is approximately 25 years old. Features of the home include full basement with finished area, central air conditioning, a fireplace and a 3-car garage. The property has a 13,990 square foot site and is located in Hoffman Estates, Hanover Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$432,000 as of January 1, 2022. The appraisal was prepared by Garry Nusinow, a Certified General Real Estate Appraiser. The intended use of the appraisal was to provide a basis for the appeal of the subject's ad valorem property tax assessment.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value selecting six comparable sales located within 1.12 miles of the subject property. The comparables have sites that range in size from 10,120 to 21,145 square feet of land area and are improved with two-story dwellings¹ of average to average plus quality construction that range in size from 2,998 to 3,477 square feet of living area. The homes range in age from 14 to 24 years old. Each comparable has a full basement, with five having finished area, central air conditioning, and a 2-car or a 3-car garage. Four comparables each have a fireplace. The comparables sold from January 2021 to October 2021 for prices ranging from \$350,000 to \$500,000 or from \$106.22 to \$150.10 per square foot of living area, land included.

The appraiser adjusted the comparables for differences with the subject in location, view, condition, dwelling size, garage size, fireplace counts and porch/patio amenity, arriving at adjusted prices ranging from \$390,500 to \$496,000 and an opinion of market value for the subject of \$432,000.

The appellant also revealed in the Residential Appeal petition that the subject property is an owner-occupied residence.

Based on this evidence, the appellant requested the subject's assessment be reduced to reflect the appraisal value when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,001. The subject's assessment reflects a market value of \$490,010 or \$144.42 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%. The notes on appeal also disclosed that the 2022 tax year was the first year of the subject's triennial general assessment period and no equalization factor was applied in Hanover Township for tax year 2022.

In support of its contention of the correct assessment the board of review submitted information on three comparables located in the same assessment neighborhood code and within the same block or a ¼ mile of the subject property. The board of review comparable #4 is the same property as comparable #3 and shall not be discussed or analyzed further. The comparables have sites that range in size from 10,519 to 13,200 square feet of land area and are improved with 2-story dwellings of frame exterior construction ranging from 3,476 to 3,780 square feet of living area. The homes are 25 or 26 years old. Each comparable has a basement, central air conditioning, a fireplace and a 2-car or a 3-car garage. The comparables sold from January to November 2023 for prices ranging from \$575,000 to \$630,000 or from \$152.12 to \$175.49 per square foot of living area, land included. Based on this evidence, the board of review requests the subject's assessment be confirmed.

¹ The Board finds the appraisal comparables to be 2-story in design based on photographs submitted in the appraisal.

In rebuttal, the appellant submitted a brief stating the subject property has an open 2022 appeal and that Section 16-185 of the Property Tax Code is applicable in this 2023 appeal given a favorable Property Tax Appeal Board ruling in the 2022 appeal.

Pursuant to section 1910.90(i) of the rules of the Property Tax Appeal Board, the Property Tax Appeal Board takes official notice that the subject property was the subject matter of appeal before the Board for the 2022 tax year under Docket No. 22-20655. (86 Ill.Admin.Code §1910.90(i)). In that appeal, the Property Tax Appeal Board issued a decision lowering the total assessment of the subject property to \$43,200 based on the evidence submitted by the parties. Furthermore, the Board finds that the subject property for tax year 2022 is an owner-occupied residence, which was not refuted by the board of review.

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 Property Tax Appeal Board finds that the total assessment as established by the Board for the 2022 tax year of \$43,200 should be carried forward to the 2023 tax year subject only to equalization as provided by section 16-185 of the Property Tax Code.

Section 16-185 of the Property Tax Code (35 ILCS 200/16-185) states in part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.

The Board finds that the subject property was the subject matter of an appeal before the Property Tax Appeal Board for the 2022 tax year under Docket No. 22-20655 in which a decision was issued based upon the evidence presented by the parties reducing the subject's total assessment to \$43,200.² The record indicates that the subject property is an owner-occupied dwelling and that 2022 and 2023 are within the same general assessment period. The record further indicates that no equalization factor was applied in Hanover Township for the 2022 tax year. Furthermore, there was no evidence the subject property recently sold establishing a different fair cash value. For these reasons the Property Tax Appeal Board finds that a reduction in the subject's

² The Property Tax Appeal Board decisions for the 2022 and 2023 tax years are being issued contemporaneously by the Board.

Docket No: 23-20198.001-R-1

assessment is warranted to reflect the assessment as established in the Board's prior year decision.

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:

May 19, 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

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

APPELLANT

Nilesh Khot, by attorney:
Scott Shudnow
Shudnow & Shudnow, Ltd.
77 West Washington Street
Suite 1620
Chicago, IL 60602

COUNTY

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