



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

APPELLANT: Manahar Patel
DOCKET NO.: 23-23238.001-R-1
PARCEL NO.: 07-23-212-013-0000

The parties of record before the Property Tax Appeal Board are Manahar Patel, the appellant, by Brian P. Liston, attorney-at-law of the Law Offices of Liston & Tsantilis, 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 **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: \$29,047
IMPR.: \$32,953
TOTAL: \$62,000

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 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 is improved with a two-story dwelling of masonry exterior construction containing 3,743 square feet of living area. The dwelling is approximately 23 years old. Features of the property include a basement that is approximately 95% finished, central air conditioning, one fireplace, 3½ bathrooms, and an attached 3-car garage.¹ The property has a 20,748 square foot site located in Schaumburg, Schaumburg Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant indicated the subject property is an owner-occupied residence and contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an

¹ Both appellant and board of review described the subject as having 3½ bathrooms. The appellant's appraiser stated in the report the subject has three full bathrooms above grade and full bath in the basement.

appraisal estimating the subject property had a market value of \$620,000 as of January 1, 2022. The appraisal was prepared by Nicholas P. Gonio, an Illinois Certified Residential Real Estate Appraiser. The purpose/intended use of the appraisal was to estimate the market value of the subject property for ad valorem tax protest purposes. The fee simple property rights were appraised. The appraiser determined the highest and best use of the property as improved was the present use. The appraiser stated within the report that the property was inspected on February 16, 2023. The appraiser reported that no adverse easements or encroachments were observed from an inspection of the site but did state the subject property backs Plum Grove Road, a busy 4-lane road in the area. Gonio indicated the overall condition of the subject property is good and the subject has good modernization for the subject market. He further stated there were no significant areas of deferred maintenance present at the time of inspection.

The appraiser developed the sales comparison approach to value using four comparable sales composed of traditional style dwellings that range in size from 2,794 to 4,452 square feet of living area. The appraisal contained copies of photographs of the comparables depicting the properties as being improved with two-story dwellings. The dwellings range in age from 24 to 35 years old. Each property has a full basement with one having finished area, central air conditioning, 2½ or 3½ bathrooms and a 2-car or 3-car garage. Three of the comparables each have one fireplace. The comparables have sites ranging in size from 10,967 to 17,424 square feet of land area. These properties are located in Schaumburg from .06 to .30 of a mile from the subject property. The sales occurred from September 2020 to November 2021 for prices ranging from \$572,000 to \$680,000 or from \$152.74 to \$204.72 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject for such items as location, site size, room count, gross living area, basement finish, garage size and number of fireplaces to arrive at adjusted prices ranging from \$608,095 to \$634,705. Based on these sales the appraiser estimated the subject property has a market value of \$620,000 or \$165.64 per square foot of living area, including land, as of January 1, 2022. The appellant requested the subject's total assessment be reduced to \$62,000 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$75,999. The subject's assessment reflects a market value of \$759,990 or \$203.04 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 board of review further indicated that 2022 was the first year of the general assessment cycle for the subject property and that no township equalization factor was applied for the 2023 tax year by Cook County assessment officials.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales composed of class 2-78 properties improved with two-story dwellings of frame or masonry exterior construction that range in size from 2,898 to 3,349 square feet of living area. The homes range in age from 24 to 34 years old. Each property has a full or partial basement with one having finished area, central air conditioning, two full bathrooms, one or two half bathrooms, and a 2-car or 3-car garage. These properties have sites ranging in size from 10,138 to 15,805 square feet of land area. Two comparables each have one fireplace. The comparables have the same assessment neighborhood code as the subject property and are located in the same assessment block as the subject or in the "subarea." These properties sold from April 2021 to June 2022 for prices ranging from \$630,000 to \$675,000 or from \$191.08 to

\$232.92 per square foot of living area, land included. Board of review comparable #2 is the same property as appellant's appraisal comparable sale #1.

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 a reduction in the subject's assessment is appropriate.

Initially, the Board finds section 1910.90(i) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code 1910.90(i)) provides:

The Property Tax Appeal Board may take official notice of decisions it has rendered, matters within its specialized knowledge and expertise, and all matters of which the Circuit Courts of this State may take judicial notice.

Pursuant to Section 1910.90(i) the Property Tax Appeal Board takes notice that the subject property was the subject matter of an appeal before this Board for the 2022 assessment year under Docket No. 22-24082.001-R-1 in which the Board determined the assessment of the subject property should be reduced to \$62,000.

The Board further finds that 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 record disclosed that the subject property is an owner-occupied dwelling. As previously stated, the Board takes notice that in Docket No. 22-24082.001-R-1 it issued a decision reducing the assessment of the subject property to \$62,000. The Board further finds that 2022 and 2023 are within the same general assessment period. The record contains no evidence indicating the subject property sold in an arm's length transaction establishing a fair cash value that is different from the fair cash value on which the Board's decision for the 2022 tax year was based.² Additionally, the record disclosed that no township equalization factor was applied for the 2023 tax year by Cook County assessment officials. For these reasons and pursuant to section 16-185

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

Docket No: 23-23238.001-R-1

of the Property Tax Code (35 ILCS 200/16-185) the Property Tax Appeal Board finds that a reduction in the subject's assessment is warranted to reflect the assessment as established in the Board's decision for the 2022 tax year.

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

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: February 17, 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

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