



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

APPELLANT: Ninos Shiba
DOCKET NO.: 23-26532.001-R-1
PARCEL NO.: 09-09-400-005-0000

The parties of record before the Property Tax Appeal Board are Ninos Shiba, the appellant(s); 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: \$28,500
IMPR.: \$36,500
TOTAL: \$65,000

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 consists of a 170,638-square-foot parcel of land, improved with a 133-year-old, one-story, frame, single-family dwelling containing 4,289 square feet of building area. The property is located in Des Plaines, Maine Township, Cook County, and is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends that overvaluation as the basis of the appeal. In support of the market value argument, appellant submitted copies of the settlement statement and the transfer declaration, which disclosed the purchase of the subject on October 2, 2023, for \$650,000. The settlement statement included listing commissions to realty companies, and the transfer declaration disclosed that the subject was advertised for sale. The petition discloses that the transfer was not between related parties and that the property was advertised for sale. The appellant did complete this section of the petition to indicate whether the property was not sold

due to a foreclosure or for a contract for deed. The petition discloses that the subject is not an owner-occupied residence.

The board of review submitted its "Board of Review Notes on Appeal." The subject's total assessment is \$111,969, which reflects a market value of \$56,000 using the level of assessment for class 2 property of 10% under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted four comparable sales. The board of review also lists the sale of the subject on October 12, 2023, for \$650,000.

The board of review submitted a brief asserting that the sale was not an arm's length transaction because the subject property was not listed on the MLS and the appellant received a special warranty deed. The board of review also argued the broker commission was paid to Discover Real Estate, agent Tom George. The board of review further stated there is no record of Discover Real Estate as a licensed brokerage.

In rebuttal, the appellant asserted that the property was listed on the open market for 929 days. The appellant also provided an MLS listing showing that the property was listed for sale.

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).

Fair cash value is defined as the amount for which a property can be sold in the due course of business and trade, not under duress, between a willing buyer and a willing seller. 35 ILCS 200/1-50. The board of review did not show that the property was under duress when sold. The property was listed on the open market for 929 days.

The Board finds the best evidence of market value to be the purchase of the subject property in July 2018 for a price of \$650,000. The appellant submitted evidence of the sale of the subject, and the board of review did not show that the sale was not at arm's-length. As the property was sold between two parties who are not related and who presume to have roughly equal bargaining power. In addition, the settlement statement includes realty commissions, and the transfer declaration attests that the subject was listed on the open market. Based on this record, the Board finds the subject property had a market value of \$650,000 as of the lien date. Since market value has been determined, the level of assessment of 10% for Class 2 property under the Cook County Real Property Assessment Classification Ordinance shall apply, and a reduction in the subject's assessment is 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: _____

December 23, 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

Ninos Shiba
390 N East River Rd
Des Plaines, IL 60062

COUNTY

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