



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

APPELLANT: Rahul Patel
DOCKET NO.: 23-30031.001-R-1 through 23-30031.003-R-1
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Rahul Patel, the appellant, by attorney Max E. Callahan, of Siegel & Callahan, 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:

DOCKET NO	PARCEL NUMBER	LAND	IMPRVMT	TOTAL
23-30031.001-R-1	06-07-308-004-0000	6,301	46,698	\$52,999
23-30031.002-R-1	06-07-308-007-0000	510	0	\$510
23-30031.003-R-1	06-07-308-010-0000	567	36	\$603

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 two-story 6-unit apartment building of masonry exterior construction with 5,451 square feet of gross building area which is approximately 53 years old. Features include a full basement finished as an apartment, 6 full bathrooms, and a four-car garage. The property has a 9,694 square foot site and is located in Elgin, Hanover Township, Cook County. The subject is classified as a class 2-11 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant completed Section IV – Recent Sale Data reporting that the subject property was purchased on September 17, 2019, for \$485,000 from the owner, Vince Minniti. It was reported that the parties to the transaction were not related, and the property was advertised prior to sale with the

Multiple Listing Service (MLS). Furthermore, the sale was not the result of a foreclosure action and was not sold using a contract for deed. In a brief supplied by counsel, it was reported that a mortgage was obtained in connection with the transaction. In further support, the appellant submitted a copy of the real estate contract related to the transaction, and a copy of the Closing Statement reiterating the purchase price, sale date and depicting distribution of a "listing commission" to Keller Williams Infinity and a "selling commission" to Preferred Home Realty. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal." The appellant supplied a copy of the final decision disclosing that the total assessment for the three parcels comprising the subject is \$54,112 or \$9.93 per square foot of gross building area. The subject's assessment reflects a market value of \$541,120 or \$99.27 per square foot of gross building area, land included, when using the median 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 information on four comparable sales, one of which is in the subject's neighborhood code and ¼ of a mile from the subject. The parcels range in size from 9,360 to 14,924 square feet of land area and are improved with class 2-11 two-story or three-story apartment buildings of masonry exterior construction. The comparables range in age from 45 to 53 years old and from 5,159 to 7,272 square feet of gross building area. Two of the comparables have full basements each of which is finished as an apartment, and two comparables have concrete slab foundations. The buildings each have 6 full bathrooms, and two comparables each have a 2-car and a 3.5-car garage, respectively. Comparable #2 has central air conditioning. The comparables sold from January 2022 to August 2023 for prices ranging from \$605,880 to \$880,000 or from \$99.68 to \$133.75 per square foot of gross building area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, counsel for the appellant requested a reduction based on the recent sale of the subject.

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.

The appellant reported the September 2019 purchase price, approximately 29 months prior to the lien date at issue of January 1, 2023, and the board of review submitted four suggested comparable sales to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to board of review comparable #2, as the building has central air conditioning and is significantly larger than the subject apartment building. The Board has given reduced weight to the subject's sale price, which sold in 2019, a date more remote in time to the lien date at issue of January 1, 2023 than other sales available in the record

and thus, also less likely to be indicative of the subject's estimated market value based on its assessment, than more recent available sales in the record.

The Board finds the best evidence of market value in the record to be comparable sales #1, #3 and #4 submitted by the board of review, one of which is located in the subject's neighborhood code, and each of which are similar to the subject in exterior construction, age and somewhat similar in building size. Adjustments are necessary to each of the best comparable sales to make them more equivalent to the subject in building size and garage amenity/capacity. However, each of these comparables sold most proximate in time to the assessment date at issue than did the sale price of the subject. The best comparables sold in January 2022 to March 2023 for prices ranging from \$605,880 to \$690,000 or from \$99.68 to \$133.75 per square foot of gross building area, including land. The subject's assessment reflects a market value of \$541,120 or \$99.27 per square foot of gross building area, including land, which is below each of the best comparable sales in this record both in terms of overall value and on a per-square-foot of gross building area basis.

Based on this record and after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds the subject's assessment is reflective of market value and a reduction in the subject's assessment is not justified.

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: July 15, 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

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