



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

APPELLANT: Nasir M. & Sakina N Khambati
DOCKET NO.: 23-37346.001-R-1
PARCEL NO.: 03-23-103-017-0000

The parties of record before the Property Tax Appeal Board (PTAB) are Nasir M. & Sakina N Khambati, the appellants, by attorney Brian P. Liston, 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, PTAB hereby finds **No Change** in the Cook County Board of Review's assessment of the property is warranted. The correct assessed valuation of the property is:

LAND: \$12,935
IMPR.: \$24,330
TOTAL: \$37,265

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants timely filed the appeal from a Cook County Board of Review decision 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 2,560 square feet building of brick-and-vinyl construction on an 8,623 square feet lot located in Wheeling of Wheeling Township, Cook County. The 23-year-old structure contained 2.5 bathrooms, central air conditioning, and an attached two-car garage.

The appellants contend the assessment in question overstates the subject's market value based on a recent appraisal. To demonstrate overvaluation, the appellants submitted an appraisal opining that the market valued the subject at approximately \$365,000 as of January 1, 2022 using the sales comparison approach. The appraiser relied on four sales from October 2019 to September 2021 within .89 miles of the subject property for purchase prices ranging from \$315,000 to \$387,000, or between \$132.46 and \$168.26 per square foot of living area. The appraiser adjusted the sales prices to account for differences between the selected comparables and the subject, explaining that "[m]edian prices are forecasted to grow continuously in 2022 within a lower and narrower range

compared with 2021.” After applying the adjustments, the appraiser determined that the subject’s market value was \$365,000. The appellants supplemented the appraisal with a letter stating that “the comparables are within the parameters set forth by USPAP ...[and] are well below the guideline distance of one mile;” that “all of the comparables are Single Family Homes;” and highlighting the effective age analysis of the appraisal before concluding that the appraiser’s comparables “further support our value.”

The county board of review responded in its “Notes on Appeal” that the subject was correctly assessed at \$37,265. The subject’s assessment reflects a market value of \$372,650, or \$145.57 per square foot of living area, when using the 10% Cook County Real Estate Classification Ordinance level of assessment for class two properties. In defense of the assessment, the county board of review submitted information about four sales of two-story frame improvements within September 2023 for sales prices from \$387,000 to \$485,000, or \$151.11 to \$215.08 per square foot.

Conclusion of Law

The appellants contend the market value of the subject property is not accurately reflected in the assessment of the subject for property tax purposes. When market value is the basis of the appeal, the appellants must prove the property’s market value by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). 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 Property Tax Appeal Board (PTAB) finds the appellants fell short of this burden of proof and a reduction in the subject’s assessment is not merited.

In this record, the board of review supplied market-value evidence that was at least as persuasive as the appellants’ evidence, mandating no change in the subject’s 2023 assessment. The appellants’ appraiser included justifications for some of the adjustments, calculations, and assumptions used in the valuation. On the other hand, the board of review submitted raw sales information for four nearby properties. While an appraisal typically commands more weight than unadjusted comparable sale data, PTAB finds the appellants’ appraisal lacks some credibility because the appraiser neglected to provide an objective basis for considering its four comparable sales “the best,” or most comparable to the subject.

On March 20, 2023, the appellants’ appraiser affirmatively asserted the sales used in the appraisal’s sales comparison approach “were considered the most recent, most similar and proximate to the subject.” Yet even upon receiving notice of the board of review’s comparable sales evidence, the appellants did not supply a sufficiently credible explanation for the inclusion of some sales over the board of review’s comparable sales. For example, none of the appraisal explanations fully justify the inclusion of an October 2019 sale of a property .32 miles away from the subject over the board of review’s 2022 sales within a quarter mile of the subject—even accounting for the 2021 and 2022 growth rate fluctuations and market conditions the appraiser described. Instead, the appellants provided general defenses of the appraiser’s comparables, noting that they were within the guideline distance of one mile and all single-family homes. But the appellants’ explanations raise more credibility questions than they resolve: the appellants asserted the comparables were “well below” one mile away from the subject—but neglected to note that .89 miles away is, in fact, nearly one mile, not “well below” one mile away, and certainly nowhere

near the proximity of the board of review's comparators. Indeed, the appellants' response does not begin to explain why the appraiser's comparables can be considered more similar than the board of review's when the board of review's comparable sales were all within a quarter mile of the subject because of the appraiser's generic and nonspecific adjustments for location. Similarly, the appellants' defense that the appraiser's comparable sales all involved single family homes undermines the appraisal's credibility. Single family homes may differ dramatically in living area, basement type, bathroom count—just about every material respect. Therefore, the appellants' inability to provide a more specific explanation for the sales included (some of which bore little resemblance to the subject improvement and required significant adjustment) in the appraisal in light of the board of review's highly comparable sales, even unadjusted, renders the appellants' evidence insufficiently credible to support an overvaluation contention. In summary, because the appellants' evidence does not demonstrate that the subject was more likely than not overvalued (or overvalued by a preponderance of the evidence), PTAB concludes a reduction in the 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:

March 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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