

# FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Mohsin N. & Nadia A. Khambati

DOCKET NO.: 23-52642.001-R-1 PARCEL NO.: 04-18-404-026-0000

The parties of record before the Property Tax Appeal Board are Mohsin N. & Nadia A. 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, 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:

**LAND:** \$27,989 **IMPR.:** \$28,000 **TOTAL:** \$55,989

Subject only to the State multiplier as applicable.

#### **Statement of Jurisdiction**

The appellants 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 1-story dwelling of masonry exterior construction with 2,786 square feet of living area. The home is approximately 51 years old. Features include a partial basement, central air conditioning, one fireplace, and a 2-car garage. The property has a 32,025 square foot site and is located in Northbrook, Northfield Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument, the appellants submitted information, including property characteristics printouts, on three equity comparables that are located within the subject's assessment neighborhood code. The comparables are improved with 1-story, class 2-04 dwellings of masonry exterior construction ranging in size from 2,593 to 3,192 square feet of

living area. The homes range in age from 45 to 60 years old. The comparables each have a full or partial basement; however, basement finish detail was not disclosed. Two comparables each have central air conditioning. Each comparable has one or two fireplaces and a 2-car garage. The comparables have improvement assessments ranging from \$18,672 to \$30,000 or from \$7.20 to \$9.40 per square foot of living area. Based on this evidence, the appellants requested that the improvement assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$55,989. The subject property has an improvement assessment of \$28,000 or \$10.05 per square foot of living area. In support of its contention of the correct assessment, the board of review submitted information on four equity comparables that are located within the subject's assessment neighborhood code and in the same tax block or ¼ of a mile from the subject property. The comparables are improved with 1-story, class 2-04 dwellings of masonry exterior construction ranging in size from 2,903 to 3,406 square feet of living area. The homes range in age from 46 to 63 years old. Each comparable has a full or partial basement, central air conditioning, one or two fireplaces, and a 2-car or a 2,5-car garage. The comparables have improvement assessments ranging from \$33,754 to \$38,200 or from \$10.28 to \$12.10 per square foot of living area. Based on this evidence, the board of review requested that the subject's assessment be confirmed.

### **Conclusion of Law**

The appellants contend assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted seven suggested equity comparables for the Board's consideration. The Board gives less weight to the appellants' comparables for which basement finish was not disclosed and would be needed to make a meaningful analysis of the similarities between the subject and comparables. The Board also gives less weight to board of review comparables #2 and #4 which differ substantially from the subject in dwelling size or age, respectively.

The Board finds the best evidence of assessment equity to be the board of review comparables #1 and #3 which are overall more similar to the subject in location, design/class, age, dwelling size, and other features. The two best comparables have improvement assessments of \$33,754 and \$38,200 or \$11.63 and \$12.10 per square foot of living area. The subject's improvement assessment of \$28,000 or \$10.05 per square foot of living area falls below the two best comparables in this record. After considering adjustments to the two best comparables for differences when compared to the subject, the Board finds the appellants did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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.

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Member	Member
Dan Dikini	Sarah Bokley
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:	September 16, 2025
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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 <u>PETITION AND EVIDENCE</u> 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**

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# **COUNTY**

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