



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

APPELLANT: Abid Sabeeh  
DOCKET NO.: 08-26969.001-I-1 through 08-26969.005-I-1  
PARCEL NO.: See Below

The parties of record before the Property Tax Appeal Board are Abid Sabeeh, the appellant(s), by attorney Huan Cassioppi Tran, of Flanagan/Bilton LLC in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented, 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
08-26969.001-I-1	15-14-116-001-0000	6,811	29,437	\$36,248
08-26969.002-I-1	15-14-116-002-0000	19	494	\$513
08-26969.003-I-1	15-14-116-006-0000	1,821	4,468	\$6,289
08-26969.004-I-1	15-14-116-017-0000	4,789	40,370	\$45,159
08-26969.005-I-1	15-14-116-021-0000	2,778	5,834	\$8,612

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property consists of five parcels of land totaling 18,546 square feet and improved with a 49-year old, one-story, industrial and garage building containing 15,752 square feet of building area. The appellant argued that the market value of the subject property is not accurately reflected in its assessed value.

In support of this overvaluation argument, the appellant submitted copies of the real estate contract, settlement statement, the warranty deed, and personal property affidavit. These documents show the subject sold on October 27, 2006 for \$260,000. The real estate contract states "[s]eller agrees to credit purchaser \$60,000.00 at closing for a master lease of vacancies." The personal property affidavit indicates the sale did not include any personal property. The appellant's brief

requests a reduction in the subject's assessment to reflect a market value of \$200,000.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's assessment of \$96,821 was disclosed. This assessment reflects a market value of \$260,116 using the Cook County Real Property Assessment Classification Ordinance level of assessments of 38 % for Class 5a and 36% for Class 5b properties.

In support of the subject's assessment, the board of review presented descriptions and assessment information on nine properties suggested as comparable. These properties sold for prices ranging from \$515,000 to \$1,350,000 or from \$40.56 to \$130.00 per square foot of building area.

In addition, the board of review argued that the sale of the subject in 2006 did not include any personal property. In support of this, the board of review submitted copies of the subject's Trustee Deed, Illinois Real Estate Transfer Declaration, PTAX-203, and CoStar Comp data printout listing details of the sale in October 2006 for \$260,000. The PTAX-203 states: in Line #7 that the property was advertised for sale; in Line #11 that the full actual consideration was \$260,000; in Line #12a that the amount of personal property was \$0.00; and in Line #13 that the net consideration for real property was \$260,000. In addition, the CoStar Comp data sheet indicates the subject was advertised on the open market for 225 days with an original asking price of \$700,000.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

After reviewing the record and considering the testimony, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal.

When overvaluation is claimed the appellant has the burden of proving the value of the property by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331Ill.App.3d 1038 (3<sup>rd</sup> Dist. 2002); Winnebago County Board of Review v. Property Tax Appeal Board, 313 Ill.App.3d 179 (2<sup>nd</sup> Dist. 2000). Proof of market value may consist of an appraisal, a recent arm's length sale of the subject property, recent sales of comparable properties, or recent construction costs of the subject property. 86 Ill.Admin.Code 1910.65(c). Having considered the evidence presented, the PTAB concludes that the evidence indicates a reduction is not warranted.

The PTAB finds the best evidence of the subject's market value is the sale of the subject in October 2006 for \$260,000. The PTAB further finds this sale did not include any personal property and that the \$60,000 referred by the appellant in the brief asserting a real estate value of \$200,000 was a credit after the purchase

for a master lease of vacancies. The PTAB finds this \$60,000 was part of the value of the real estate and not an ancillary cost implied by the appellant's brief. The PTAB finds this is supported by the CoStar Comps data sheet indicating an asking price of \$700,000.

Based on this record the Property Tax Appeal Board finds that the subject property's assessment reflects a market value that supports the subject's sale in 2006 and reduction is not 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.



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Chairman



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Member



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Member



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Member

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Member

DISSENTING: \_\_\_\_\_

C E R T I F I C A T I O N

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 20, 2013



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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 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 the subsequent year 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.

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.