



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

APPELLANT: Subhodreddy Pathakota
DOCKET NO.: 20-22440.001-R-1
PARCEL NO.: 02-05-100-008-0000

The parties of record before the Property Tax Appeal Board are Subhodreddy Pathakota, the appellant; 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: \$17,339
IMPR.: \$38,301
TOTAL: \$55,640

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 2020 tax year. The Property Tax Appeal Board (PTAB) finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a 39,988 square foot parcel of land improved with an approximate 28-year-old, two-story, frame, single-family dwelling of 2,954 square feet of living area. Features of the home include central air conditioning, a fireplace, and a three-car garage. The property is located in Barrington, Palatine Township, Cook County and is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal and also requested a reduction in the subject's land assessment.¹ In support of the overvaluation argument, the appellant submitted evidence disclosing the subject property was purchased by the appellant in August

¹ The appellant requested a reduction in the subject's land assessment but did not provide a land analysis for the Board's consideration.

2016 for a price of \$412,000 or \$139.47 per square foot of living area. The appellant included copies of the settlement statement and closing disclosure documents and completed Section IV of the residential appeal petition further disclosing the sale did not involve family members or related corporations; the subject was sold through a realtor with Re/Max Showcase which was advertised for sale in a Multiple Listing Service (MLS) for a period of four months, and the sale was due to foreclosure action.

In further support of the overvaluation argument, the appellant submitted information on three comparable sales located in close proximity to the subject.² The comparables have sites that range in size from 39,988 to 43,560 square feet of land area and are improved with two-story dwellings of brick and wood siding exterior construction that range in size from 2,794 to 4,104 square feet of living area and are either 25 or 32 years old. The comparables have features with varying degrees of similarity to the subject. The comparables sold from July 2014 to February 2016 for prices that range from \$441,000 to \$485,000 or from \$122.23 to \$170.00 per square foot of living area, land included.

Based on the evidence, the appellant requested a reduction in the subject's total assessment to \$41,200 with a \$11,107 land assessment and a \$30,093 improvement assessment. The requested assessment would reflect a total market value of \$412,000 or \$139.47 per square foot of living area, land included, when applying the 10% level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance.

The board of review submitted its "Board of Review Notes on Appeal"³ disclosing the total assessment for the subject of \$55,640 and that 2019 was the beginning of the triennial assessment period for Palatine Township. The subject's assessment reflects a market value of \$556,400 or \$188.35 per square foot of living area, land included, when applying the 10% level of assessment for class 2 property of under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment, the board of review submitted data on four comparable sales, two of which are located within the same neighborhood code as the subject property. The comparables have sites that range in size from 18,848 to 48,643 square feet of land area and are improved with two-story dwellings of frame, masonry, or frame and masonry exterior construction that range in size from 3,148 to 3,787 square feet of living area and range in age from 16 to 28 years old. The comparables have features with varying degrees of similarity to the subject. The comparables sold from December 2018 to October 2020 for prices that range from \$658,000 to \$784,900 or from \$197.72 to \$226.07 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

² The Board takes notice that the appellant presented the same three comparables sales regarding the subject's PTAB appeals for the 2017 tax year (Docket #17-20852) and this 2020 tax year appeal but occurred within different triennial assessment periods for Palatine Township. The appellant also presented for both tax years the same land and total assessments for the three comparables sales, except for a change in comparable sale #1's land assessment but no change in its total assessment.

³ In the notes on appeal, the board of review referenced a supplemental brief which was not presented in their evidence to the PTAB.

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.

In support of the respective positions before the Board, the appellant submitted the sale of the subject property in 2016, and the parties submitted a total of seven comparables sales. The Board gives little weight to the subject's sale in August 2016 for a price of \$412,000, as the sale occurred over three years prior to the January 1, 2020 assessment date and is less likely to reflect the subject's market value as demonstrated by more recent comparable sales. Likewise, the Board gives reduced weight to the appellant's comparables with sales dates that in 2014, 2015, or 2016, which is more than three years prior to the January 1, 2020 assessment date at issue. The Board also gives less weight to the board of review comparable sales #1 and #4 due to differences in location in different neighborhood codes, larger dwelling size, and/or newer age when compared to the subject.

The Board finds the best evidence of market value to be board of review comparable sales #2 and #3 which are located within the subject's same neighborhood code and also sold more proximate in time to the January 1, 2020 valuation date at issue for this appeal. These two comparables sold in October 2020 and June 2019 for prices of \$784,900 and \$690,000 or \$226.07 and \$208.90 per square foot of living area, land included, respectively. The subject's assessment reflects a market value of \$556,400 or \$188.35 per square foot of living area, land included, which is less than the two best comparable sales in this record. After considering adjustments to the comparable sales for difference with the subject, the Board finds that the appellant did not prove by a preponderance of the evidence that the subject is overvalued, and a reduction in the subject's market value as reflected by its assessment 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. 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: October 18, 2022



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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