



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

APPELLANT: Yash Patel
DOCKET NO.: 22-22510.001-R-1
PARCEL NO.: 01-12-403-021-0000

The parties of record before the Property Tax Appeal Board are Yash Patel, the appellant, by attorney Stephanie Park of Park & Longstreet, P.C. in Inverness; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds a reduction 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: \$23,348
IMPR.: \$81,652
TOTAL: \$105,000

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 2022 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 dwelling of masonry exterior construction with 5,014 square feet of living area. The dwelling is approximately 7 years old. Features of the home include a full walkout basement with finished area, central air conditioning, five full bathrooms, one half bathroom, a fireplace and a three-car garage.¹ The property has a 58,370 square foot site and is located in Inverness, Barrington Township, Cook County. The subject is classified as a class 2-09 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted an appraisal valuing the fee simple property rights of the subject property for

¹ The parties differ as to the subject's garage size, the Board finds the best evidence of size is found in the appellant's appraisal, since the appraiser made an interior and exterior inspection of the property.

an ad valorem tax appeal, prepared by Charles Walsh, a State of Illinois Certified Residential Appraiser. The appraiser estimated the subject property's market value as of January 1, 2022 at \$1,050,000. The appellant's appraiser inspected the interior and exterior of the subject property on August 1, 2022, and observed that subject is energy efficient and had no functional, physical, or external problems.

Under the sales comparison approach to value the appraiser analyzed three comparable sales that are located from .29 to .75 of a mile from the subject property. The comparables have sites ranging in size from 34,238 to 49,789 square feet of land area. The comparables are improved with two-story dwellings that range in size from 4,588 to 5,872 square feet of living area. The homes range in age from 25 to 32 years old. The comparables each have a full basement with finished area, one of which is a walkout. Each comparable has from four or six full bathrooms, one additional half bathroom, central air conditioning, from one to five fireplaces and either a three-car or a four-car garage. The comparables sold from January 2021 to April 2022 for prices ranging from \$900,000 to \$1,085,000 or from \$153.27 to \$212.51 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject in site size, age, gross living area, bathroom count and other features resulting in adjusted prices ranging from \$864,602 to \$1,125,134. Using this data, the appraiser arrived at an estimated market value for the subject of \$1,050,000 or \$209.41 per square foot of living area, including land, as of January 1, 2022.

Based on this evidence, the appellant requested the subject's total assessment be reduced to \$105,000 to reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$126,000. The subject's assessment reflects a market value of \$1,260,000 or \$251.30 per square foot of living area, including land, using 5,222 square feet, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment, the board of review submitted information on four comparable properties, where sales data was provided for comparables #1 and #3. Since no sales data was provided for comparables #2 and #4 to address the appellant's overvaluation argument, these two comparables will not be further addressed in this analysis.

The board of review's comparables #1 and #3 have the same assessment neighborhood code and property classification code as the subject. The comparables have sites containing 54,145 and 44,435 square feet of land area that are improved with two-story dwellings of masonry exterior construction with 6,205 and 6,356 square feet of living area, respectively. The dwellings are 6 and 13 years old, respectively. Each comparable has a full basement that is finished with a formal recreation room, five full bathrooms, two additional half bathrooms, central air conditioning, four of five fireplaces and a four-car garage. The comparables sold in January 2020 and February 2022 for prices of \$1,358,000 and \$1,966,850 or for \$218.86 and \$309.45 per square foot of living area, including land, respectively.

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

In written rebuttal, the appellant argued that the board of review's two unadjusted sales should be given no weight, nor should the board of review's two equity comparables be given any weight since they do not address the market value contention. Additionally, the appellant contends board of review comparables #1 and #3 are 1,191 and 1,342 square feet larger than the subject dwelling, respectively.

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant submitted an appraisal of the subject property with an opinion of market value as of the lien date at issue and the board of review presented two suggested comparable sales for the Board's consideration.

The Board finds the best evidence of market value to be the appraisal submitted by the appellant. The appraiser chose three comparable sales that occurred proximate in time to the lien date at issue and these comparables are located in close proximity to the subject. The appraiser adjusted the comparables for differences from the subject to arrive at an estimated market value of \$1,050,000 or \$209.41 per square foot of living area, including land, as of January 1, 2021. The subject's assessment reflects a market value of \$1,260,000 or \$251.30 per square foot of living area, including land, which is above the appraised value. The Board has given less weight to the board of review's comparable sales #1 and #3, due to their substantially larger dwelling sizes, when compared to the subject. Moreover, board of review comparable #1 has a sale date that occurred 24 months prior to the lien date at issue. Based on this record, the Board finds the subject property had a market value of \$1,050,000 as of the assessment date at issue. Since market value has been established the Cook County Real Property Assessment Classification Ordinance for class 2 property of 10.00% shall apply which is also commensurate with the appellant's request. (86 Ill.Admin.Code §1910.50(c)(2)).

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

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: August 19, 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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