



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

APPELLANT: Neil Shah  
DOCKET NO.: 22-22795.001-R-1  
PARCEL NO.: 01-21-403-002-0000

The parties of record before the Property Tax Appeal Board are Neil Shah, 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:** \$18,311  
**IMPR.:** \$61,689  
**TOTAL:** \$80,000

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 is improved with a two-story dwelling of frame and masonry exterior construction with 3,847 square feet of living area. The dwelling is approximately 10 years old. Features of the home include a full basement with finished area,<sup>1</sup> central air conditioning, a fireplace and a three-car garage. The property has a 26,159 square foot site and is located in South Barrington, Barrington Township, Cook County. The subject is classified as a class 2-08 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 estimating the subject property had a market value of \$800,000 as of January 1, 2022. The appraisal was prepared by Charles Walsh, a State of Illinois Certified

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<sup>1</sup> The parties differ as the subject dwelling's basement finish. The Board finds the appellant's appraiser made an interior and exterior inspection and described the subject dwellings with finished basement area.

Residential Real Estate Appraiser. The purpose of the appraisal is to develop an opinion of market value for a property tax appeal. Walsh inspected the interior and exterior of the subject property on July 22, 2022, and noted that no physical, functional, or external problems were observed during inspection.

In estimating the market value of the subject property, the appraiser developed the sales comparison approach to value using three comparable sales. The comparables have sites ranging in size from 17,657 to 21,115 square feet of land area and are located either .16 or .85 of a mile from the subject property. The comparables are improved with two-story dwellings that range in size from 3,340 to 4,988 square feet of living area. The homes range in age from 6 to 14 years old. The comparables have other features with varying degrees of similarity when compared to the subject. The sales occurred from March to August 2021 for prices ranging from \$740,000 to \$956,000 or from \$165.40 to \$221.56 per square foot of living area, including land. The appraiser made adjustments to the three comparables for differences from the subject to arrive at adjusted prices ranging from \$772,745 to \$902,135. Based on the adjusted prices the appraiser opined the subject has an estimated value of \$800,000 or \$207.95 per square foot of living area, including land.

In further support of the overvaluation argument, the appellant submitted information on three comparable sales described as class 2-08 properties that have the same assessment neighborhood code as the subject. The comparables have sites that range in size from 17,697 to 59,198 square feet of land area and are improved with two-story dwellings of frame or frame and masonry exterior construction ranging in size from 3,833 to 4,197 square feet of living area. The dwellings are from 2 to 15 years old. The comparables have other features with varying degrees of similarity when compared to the subject. The sales occurred from June 2019 to September 2020 for prices ranging from \$770,000 to \$879,655 or from \$197.64 to \$215.24 for per square foot of living area, including land.

The appellant requested the subject's total assessment be reduced to \$76,030, which would reflect a market value of \$760,300 or \$197.63 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% as determined by the Illinois Department of Revenue.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$90,920. The subject's assessment reflects a market value of \$909,200 or \$236.34 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on three comparables with equity data which is not responsive to the appellant's overvaluation argument. The board of review failed to address the appellant's overvaluation argument with market value evidence. Based on this equity evidence, the board of review requested confirmation of the subject's assessment.

**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 Property Tax Appeal Board finds the only evidence of market value in the record to be the appraisal of the subject property and the four additional comparables sales provided by the appellant. However, the Board has given less weight to the four additional comparables provided by the appellant due to their sale dates occurring in 2019 or 2020, less proximate in time to the January 1, 2022, assessment date, than the sales chosen by the appellant's appraiser. The Board finds the best evidence of market value to be the appraisal submitted by the appellant estimating the subject property had a market value of \$800,000 as of January 1, 2022. The appraiser developed the sales comparison approach to value using three recent comparable sales with varying degrees of similarity to the subject property. The appraiser adjusted the comparables for differences from the subject property and arrived at an estimated market value of \$800,000. The subject's assessment reflects a market value of \$909,200, which is greater than the appraised value. Based on this record, the Board finds the subject property had a market value of \$800,000 as of the assessment date at issue. Since market value has been established the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10.00% shall apply. 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: September 16, 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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