FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Mustafa Altinakar
DOCKET NO.: 23-30278.001-R-1
PARCEL NO.: 22-33-111-002-0000

The parties of record before the Property Tax Appeal Board are Mustafa Altinakar, the appellant(s), by attorney Christopher G. Walsh, Jr., of Walsh Law, LLC 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:	$11,593
IMPR.:	$35,406
TOTAL:	$46,999

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 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 twenty-seven-year-old, two-story dwelling of masonry construction, with 2,200 square feet of living area on a 17,836 square foot lot in Lemont, Lemont Township, Cook County. The subject is classified as 2-04 under the Cook County Real Property Assessment Classification Ordinance. Features of the home include two full bathrooms, one half bathroom, a full basement and a two-car garage.

The appellant contends overvaluation as the basis of appeal. In support of its market value argument, the appellant completed Section IV – Recent Sale Data in its Residential Appeal Form indicating the subject property was purchased on January 6, 2020, for $417,500 or $189.77 per square foot of living area. The appellant indicates that the buyer and seller were not related, that the property was sold by through a realtor and was listed on a multiple listing service. The appellant submitted a printout of the MLS listing showing that the property was listed on August

2, 2019, and submitted a settlement statement showing legal fees paid to both a buyer's attorney and a seller's attorney. The appellant's attorney, Christopher Walsh, Jr., submitted a letter arguing for the principal of relying on three-year-old sales as evidence of market value. The letter cites two PTAB decisions – 00-23424 and 03-21388 and points to the use of three-year median levels of assessment of class-2 properties. The appellant also submitted the Cook County Board of Review decision letter stating the assessed value as $46,999.

The board of review submitted its "Board of Review Notes on Appeal" stating the total valuation assessment for the subject property as $46,999 with an improvement assessment of $35,406. The valuation assessment reflects a market value of $469,990 when applying the 10% Cook County Real Estate Classification Ordinance assessment for class two properties, or $213.63 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on four comparable sales taking place from August 2021, to June 2023, for prices ranging from $517,000 to $735,246 or $228.36 to $290.60 per square foot of living area. The comparable properties are single-story buildings of masonry or frame or frame and masonry construction, ranging in age from one to thirty years-old and ranging in size from 2,059 to 2,592 square feet of living area. All are located in Lemont.

Conclusion of Law

The appellant contends that 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 proven by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e); Winnebago County Bd. of Review v. Property Tax Appeal Bd., 313 Ill. App. 3d 1038, 1043 (2d Dist. 2000). Proof of market value may consist of a recent sale or appraisal of the subject property, comparable sales, or construction costs. 86 Ill.Admin.Code §1910.65(c). The Property Tax Appeal Board (PTAB) finds the appellant *did not meet* this burden of proof.

The Board acknowledges the decision in 03-21388, a copy of which appellant's counsel submitted to the record, however, applying the instant facts to the law, we arrive at a different conclusion in this case. In 03-21388, the three-year-old sale of the subject property was the best evidence of market value because it was the only evidence of market value. The board of review offered no comparable sales. In the current case, we find the best evidence of market value to be the comparable sales offered by the board of review. Those sales are closer in time to the lien date than the sale of the subject property. The subject property's July 14, 2021 price per square foot of $189.77 is below the market range of $228.36 to $290.60 per square foot of living area year established by the comparable sales. Therefore, the Board finds the appellant *did not* prove by a preponderance of the evidence that the subject was overvalued, and a reduction based on market value 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.

Chairman

Member

Member

Member

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: September 15, 2026

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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Mustafa Altinakar, by attorney:
Christopher G. Walsh, Jr.
Walsh Law, LLC
111 West Washington Street
Suite 1150
Chicago, IL 60602

COUNTY

Cook County Board of Review
County Building, Room 601
118 North Clark Street
Chicago, IL 60602