



## FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Brian Y. Park  
DOCKET NO.: 23-33537.001-R-1  
PARCEL NO.: 02-21-221-012-0000

The parties of record before the Property Tax Appeal Board are Brian Y. Park, the appellant, by Andreas Mamalakis, attorney-at-law of the Law Offices of Andreas Mamalakis in Kenosha, Wisconsin, 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:

<b>LAND:</b>	\$5,940
<b>IMPR.:</b>	\$41,400
<b>TOTAL:</b>	\$47,340

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.<sup>1</sup>

### **Findings of Fact**

The subject property is improved with a two-story dwelling of frame construction containing 2,855 square feet of living area. The dwelling is approximately 26 years old. Features of the property include a partial basement, central air conditioning, one fireplace, 2½ bathrooms, and a 2-car garage. The property has a 9,900 square foot site located at 870 Ellis Street, Palatine, Palatine Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant indicated the subject property is an owner-occupied residence and contends assessment inequity regarding the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables consisting of class 2-

<sup>1</sup> The appellant's counsel originally requested a hearing before the Property Tax Appeal Board but subsequently withdrew the request for a hearing.

78 properties improved with two-story dwellings of frame construction that range in size from 2,528 to 3,269 square feet of living area. The homes range in age from 22 to 40 years old. Each property has a full or partial basement, one fireplace, and a 2-car, 3-car or 3.5-car garage. The comparables have 2½, 3 or 3½ bathrooms. Four comparables have central air conditioning. These properties have the same assessment neighborhood code as the subject property and are located from .21 to .52 of a mile from the subject property. Their improvement assessments range from \$33,940 to 45,766 or from \$13.43 to \$14.21 per square foot of living area. The appellant requested the subject's improvement assessment be reduced to \$39,685.

The appellant submitted a copy of the final decision issued by the board of review disclosing the subject's total assessment was reduced from \$54,700 to \$50,849. The appellant indicated the subject had an improvement assessment of \$44,909 or \$15.73 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" that referenced an address (883 Ellis St., Palatine, Palatine Township) and property index number (02-21-223-012-0000) which is for a property other than the subject property. The board of review further indicated that 2022 was the first year of the general assessment cycle for Palatine Township and that no equalization factor was applied in tax year 2023 by county assessment officials.

Even though the board of review referenced the incorrect subject property in its submission, it provided information on three equity comparables with the same classification code and neighborhood code as the subject property in support of the assessment. The comparables are composed of class 2-78 properties improved with two-story dwellings of frame or frame and masonry exterior construction that range in size from 2,817 to 3,564 square feet of living area. The homes range in age from 10 to 19 years old. Each property has a full basement, central air conditioning, one fireplace, 2½ or 3½ bathrooms and a 2-car or 3-car garage. Their improvement assessments range from \$49,438 to \$63,060 or from \$17.55 to \$18.43 per square foot of living area.

### **Conclusion of Law**

The appellant contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds a reduction in the subject's assessment is appropriate.

Initially, the Board finds section 1910.90(i) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code 1910.90(i)) provides:

The Property Tax Appeal Board may take official notice of decisions it has rendered, matters within its specialized knowledge and expertise, and all matters of which the Circuit Courts of this State may take judicial notice.

Pursuant to Section 1910.90(i) the Property Tax Appeal Board takes notice that the subject property was the subject matter of an appeal before this Board for the 2022 assessment year under Docket No. 22-31826.001-R-1 in which the Board determined the total assessment of the subject property should be reduced to \$47,340.

The Board further finds that section 16-185 of the Property Tax Code (35 ILCS 200/16-185) states in part:

If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel on which a residence occupied by the owner is situated, such reduced assessment, subject to equalization, shall remain in effect for the remainder of the general assessment period as provided in Sections 9-215 through 9-225, unless that parcel is subsequently sold in an arm's length transaction establishing a fair cash value for the parcel that is different from the fair cash value on which the Board's assessment is based, or unless the decision of the Property Tax Appeal Board is reversed or modified upon review.

The record disclosed that the subject property is an owner-occupied dwelling. As previously stated, the Board takes notice that in Docket No. 22-31826.001-R-1 it issued a decision reducing the total assessment of the subject property to \$47,340. The Board further finds that 2022 and 2023 are within the same general assessment period. The record contains no evidence indicating the subject property sold in an arm's length transaction establishing a fair cash value that is different from the fair cash value on which the Board's decision for the 2022 tax year was based.<sup>2</sup> Additionally, the record disclosed that no township equalization factor was applied for the 2023 tax year by Cook County assessment officials. For these reasons and pursuant to section 16-185 of the Property Tax Code (35 ILCS 200/16-185) the Property Tax Appeal Board finds that a reduction in the subject's assessment is warranted to reflect the assessment as established in the Board's decision for the 2022 tax year.

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<sup>2</sup> The decisions for the 2022 and 2023 tax years for the subject property are being issued contemporaneously by the Property Tax Appeal Board.

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.



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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:

January 20, 2026

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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 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**

Brian Y Park, by attorney:  
Andreas Mamalakis  
Law Offices of Andreas Mamalakis  
4844 89th Place  
Kenosha, WI 53142

**COUNTY**

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