



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

APPELLANT: Kalpendu Patel  
DOCKET NO.: 24-00734.001-R-1  
PARCEL NO.: 09-09-125-003

The parties of record before the Property Tax Appeal Board are Kalpendu Patel, the appellant, by attorney David Kieta, of Kieta Law, LLC in Winfield; and the Kane 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 **Kane** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$33,516  
**IMPR.:** \$209,021  
**TOTAL:** \$242,537

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Kane County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 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 frame and brick exterior construction with 4,058 square feet of living area. The dwelling was constructed in 2018 and is six years old. Features of the home include a full basement, central air conditioning, and a 727 square foot garage.<sup>1</sup> The property has a 9,627 square foot site and is located in South Elgin, St. Charles Township, Kane County.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on six equity comparables located from .84 of a mile to 1.43 miles from the subject. The comparables consist of two-story dwellings of frame or brick exterior construction ranging in size from 3,950 to

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<sup>1</sup> The Board finds the subject's property record card submitted by the board of review, which contains a photograph and detailed property sketch, and which was not refuted by the appellant in rebuttal, to be the best evidence in the record of the subject's features.

4,177 square feet of living area. The homes range in age from 8 to 16 years old. Each dwelling has central air conditioning, one or two fireplaces, and a full basement. One comparable has a 768 square foot garage. The comparables have improvement assessments ranging from \$158,276 to \$184,762 or from \$38.03 to \$46.11 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$176,361 or \$43.46 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$242,537. The subject property has an improvement assessment of \$209,021 or \$51.51 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five equity comparables located within the subject's subdivision and within .24 of a mile of the subject. The comparables consist of two-story dwellings of frame and brick or frame and stone exterior construction ranging in size from 3,475 to 4,155 square feet of living area. The homes were built from 2015 to 2017. Each dwelling has central air conditioning, a basement, and a garage ranging in size from 697 to 949 square feet of building area. Three comparables each have a fireplace. The comparables have improvement assessments ranging from \$172,072 to \$220,382 or from \$49.52 to \$54.20 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The taxpayer 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 the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of 11 equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the comparables presented by the appellant, which are located more than one mile from the subject and/or lack a garage, a feature of the subject.

The Board finds the best evidence of assessment equity to be the comparables submitted by the board of review, which are located in the subject's subdivision and are similar to the subject in age, dwelling size, and features. These comparables have improvement assessments that range from \$172,072 to \$220,382 or from \$49.52 to \$54.20 per square foot of living area. The subject's improvement assessment of \$209,021 or \$51.51 per square foot of living area falls within the range established by the best comparables in this record. Based on this record and after considering adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment 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: \_\_\_\_\_

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 21, 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

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

APPELLANT

Kalpendu Patel, by attorney:  
David Kieta  
Kieta Law LLC  
0S331 Summit Drive  
Winfield, IL 60190

COUNTY

Kane County Board of Review  
Kane County Government Center  
719 Batavia Ave., Bldg. C, 3rd Fl.  
Geneva, IL 60134