



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

APPELLANT: George Tang
DOCKET NO.: 13-02673.001-R-1
PARCEL NO.: 08-19-114-017

The parties of record before the Property Tax Appeal Board are George Tang, the appellant, and the DuPage County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds a reduction in the assessment of the property as established by the DuPage County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$56,220
IMPR.: \$40,440
TOTAL: \$96,660

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the DuPage County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2013 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 one-story single-family dwelling of brick and frame construction with approximately 1,561 square feet of living area. The dwelling was constructed in 1959. Features of the home include a partial basement with finished area, central air conditioning, a fireplace and an attached three-car garage. The property has a 9,407 square foot

site and is located in Naperville, Lisle Township, DuPage County.

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 \$290,000 or \$185.78 per square foot of living area, including land, as of February 25, 2013. The appellant's appraiser utilized both the sales and cost approaches to value to arrive at the final opinion. Under the sales comparison approach, the final value opinion was \$290,000. Under the cost approach, the final value opinion was \$290,088.

Based on this evidence, the appellant requested a total assessment reflective of the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$99,180. The subject's assessment reflects a market value of \$297,659 or \$190.68 per square foot of living area, land included, when using the 2013 three year average median level of assessment for DuPage County of 33.32% as determined by the Illinois Department of Revenue.

In response to the appeal, the board of review noted the appraisal was prepared for a refinance transaction and the opinion of value was approximately seven weeks after the assessment date of January 1, 2013. In addition, the township assessor noted that appraisal sale #2 was sold "as-is" as a tear down. The appellant's appraiser reported in the addendum that the dwelling in sale #2 was razed after the purchase.

In support of its contention of the correct assessment the board of review through the Lisle Township Assessor submitted information on three comparable sales, one of which appears to be a split-level dwelling based on the photograph submitted with the evidence.

Based on this evidence and arguments, 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 Board finds the best evidence of market value to be the appraisal submitted by the appellant with an estimated market value of \$290,000 as of February 25, 2013. The appraiser utilized comparable ranch-style dwellings that bracketed the subject in size, age and several features. In the addendum, the appraiser explained the selection of some of the properties was necessary due to the lack of similar properties to the subject. The appraiser also made adjustments to the comparable properties for differences from the subject and explained the basis for the adjustments in the addendum. The appraiser further considered the fact that the subject property is a rental home, but determined that there were no sales of single-family homes sold as rentals for purposes of developing an income approach to value. The Property Tax Appeal Board has given reduced weight to the sales presented by the board of review which lack adjustments for differences, differ in design and/or differ in dwelling and basement sizes when compared to the subject dwelling. The subject's assessment reflects a market value of \$297,659 or \$190.68 per square foot of living area, including land, which is slightly above the appraised value. On this record, the Board finds the subject property is overvalued and a reduction in the subject's assessment commensurate with the appellant's request is warranted.

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.

Chairman



Member

Member



Member

Acting Member



Acting 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: November 20, 2015



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 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 the subsequent year 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.

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.