



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

APPELLANT: Al Jankauskas
DOCKET NO.: 14-03343.001-R-2
PARCEL NO.: 09-06-411-016

The parties of record before the Property Tax Appeal Board are Al Jankauskas, the appellant, by attorney Ram Natarajan of Natarajan Legal, P.C., in Chicago; and the DuPage 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 **DuPage** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$ 74,540
IMPR.: \$199,870
TOTAL: \$274,410

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 2014 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 part two-story and part one-story frame dwelling that contains 3,471 square feet of living area. The original portion of the dwelling contains 1,693 square feet of living area that was built in 1924. A 1,778 square foot two-story addition and a 936 square foot attached garage were constructed in 2013. Other features include a 1,640 square foot finished basement, central air conditioning and two fireplaces. The subject has an 11,680 square foot site. The subject property is located in Downers Grove Township, DuPage County, Illinois.

The appellant's appeal is based on overvaluation. In support of this argument, the appellant submitted evidence disclosing the subject property was purchased on June 2, 2012 for \$483,500. The appellant did not complete Section IV—Recent Sale Data of the appeal petition. The appellant submitted the settlement statement sheet associated with the sale of the subject

property. Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject property of \$274,410. The subject's assessment reflects a market value of \$823,312 or \$237.20 per square foot of living area including land when applying the 2014 three year average median level of assessment for DuPage County of 33.33%. In support of the subject's assessment, the board of review submitted a letter addressing the appeal, a building permit and four comparable sales.

The comparables consist of a part two-story and part one-story; a part two-story, part three-story and part one-story; and a part two-story and part three-story dwellings of frame exterior construction that were built from 2002 to 2006. Features had varying degrees of similarity when compared to the subject. The dwellings range in size from 3,346 to 3,830 square feet of living area and are situated on sites that contain 12,000 or 15,000 square feet of land area. The comparables sold from July 2013 to March 2014 for prices ranging from \$915,000 to \$1,000,000 or from \$258 to \$279 per square foot of living area including land, rounded.

With respect to the evidence submitted by the appellant, the board of review argued that when the subject property was purchased in June 2012, the dwelling was comprised of a 1,693 square foot two-story dwelling that was built in 1924. After the subject's sale, a building permit was issued to construct a 1,778 square foot two-story addition, a 936 square foot attached garage and interior remodeling at a reported cost of \$280,000. These improvements were completed in December 2013. The board of review contends the subject dwelling had an effective age of 2007. The board of review contends the subject's June 2012 sale price does not reflect the improvements made after its sale, but before the January 1, 2014 assessment date. Based on this 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 did not meet this burden of proof and no reduction in the subject's assessment is warranted.

The Property Tax Appeal Board gave little weight to the subject's June 2012 sale price. The Board finds the sale price does not reflect the subject's market value as of the January 1, 2014 assessment date due to the construction of a new two-story addition, a new garage and updated condition from the interior remodeling that was completed by December 2013.

The board of review submitted three comparable sales that had varying degrees of similarity when compared to the subject in location, land area, design, age, dwelling size and features. These comparables sold from July 2013 to March 2014 for prices ranging from \$915,000 to \$1,000,000 or from \$258 to \$279 per square foot of living area including land, rounded. The subject's assessment reflects an estimated market value of \$823,312 or \$237.20 per square foot

of living area including land, which falls below the range established by the most similar comparable sales contained in this record. Based on a preponderance of the most credible market value evidence contained in this record, the Board finds the subject's estimated market value as reflected by its assessment is supported.

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

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: August 19, 2016



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.