



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

APPELLANT: Sridhar & Sri Ramamoorthy  
DOCKET NO.: 16-00818.001-R-1  
PARCEL NO.: 07-01-12-104-035-0000

The parties of record before the Property Tax Appeal Board are Sridhar & Sri Ramamoorthy, the appellants, by attorney Michael R. Davies, of Ryan Law LLP in Chicago; and the Will 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 Will County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$43,014  
**IMPR.:** \$100,308  
**TOTAL:** \$143,322

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants timely filed the appeal from a decision of the Will County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2016 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 exterior construction with 2,856 square feet of living area. The dwelling was constructed in 2003. Features of the home include a partial basement, central air conditioning, a fireplace and a 656 square foot garage. The property is located in Naperville, Wheatland Township, Will County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted limited information on four comparable sales in the Section V grid analysis of the appeal petition. While the appellants were requested to provide additional information to complete the appeal, by letter dated August 10, 2017 by the Property Tax Appeal Board, the appeal was accepted, and the board of review was simultaneously, but separately, notified of its duty to respond to the appeal within 90 days. The comparables are improved with two-story dwellings that were built from 1993 to 2005 and range in size from 2,586 to 3,248 square feet of

living area. One comparable has central air conditioning and a 603 square foot garage. Three comparables have a fireplace. The sales occurred from October 2015 to June 2016 for prices ranging from \$345,000 to \$470,000. The appellants requested the subject's total assessment be reduced to \$138,769.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$143,322. The subject's assessment reflects a market value of \$430,914 or \$150.88 per square foot of living area, land included, when using the 2016 three-year average median level of assessment for Will County of 33.26% as determined by the Illinois Department of Revenue.

The township assessor disclosed that two of the appellants' comparables are in the subject's subdivision.

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales identified by the township assessor located within .40-of a mile from the subject and in the same subdivision. The appellants and board of review share two common comparables. The appellants' comparable #1 is the board of review's comparable #3 and the appellants' comparable #3 is the board of review's comparable #4. The five comparables are improved with two-story dwellings of frame exterior construction. The comparables contain from 2,682 to 3,248 square feet of living area. The dwellings were constructed from 2003 to 2005. Each comparable has a full basement with one comparable having a finished area, central air conditioning, a fireplace and a garage ranging in size from 441 to 656 square feet of building area. These properties sold from April 2015 to August 2016 for prices ranging from \$422,000 to \$480,000 or from \$132.50 to \$178.97 per square foot of living area. The board of review requested that the assessment be confirmed.

### **Conclusion of Law**

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

The parties submitted evidence on seven comparable properties to support their respective positions before the Property Tax Appeal Board.

The Board finds the best evidence of market value to be the comparable sales #2 through #5 provided by the board of review, which includes one common comparable. These comparables sold for prices ranging from \$132.50 to \$156.36 per square foot of living area, including land. The subject's assessment reflects a market value of \$150.88 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. The Board gave little weight to the appellant/board of review comparable #1 based on its finished basement when compared to the subject's unfinished basement. Little weight was given the appellant's evidence for comparables #2 and #4 which contain little descriptive information

about the dwellings to allow the Property Tax Appeal Board to conduct a meaningful comparative analysis of the comparable sales to the subject property. On this record, the Property Tax Appeal Board finds that the subject is not overvalued and no reduction in the assessment of the subject property 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. 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: \_\_\_\_\_

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 20, 2019



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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

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