



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

APPELLANT: Visal Rahul  
DOCKET NO.: 16-05990.001-R-1  
PARCEL NO.: 09-13-304-028

The parties of record before the Property Tax Appeal Board are Visal Rahul, the appellant, by attorney Michael R. Davies, of Ryan Law LLP 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:** \$19,010  
**IMPR.:** \$63,200  
**TOTAL:** \$82,210

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 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 condominium with 1,400 square feet of living area. The dwelling was constructed in 1968. Features of the home include central air conditioning and a detached garage. The property is located in Hinsdale, Downers Grove Township, DuPage County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In support of the overvaluation claim, the appellant submitted limited descriptive information for fifteen comparable properties that were reported to be located from .06 to .68 of a mile from the subject property. The Board requested that the appellant complete the grid analysis in Section V of the appeal petition. The appellant failed to comply with the Board's request and failed to disclose the comparables' design, exterior construction, foundation type and features such as central air conditioning, fireplaces and garages. The comparables were

reported to be built from 1968 to 1983 and range in size from 1,195 to 1,515 square feet of above grade living area. The comparables sold from April 2013 to August 2015 for prices ranging from \$104,667 to \$244,000 or from \$72.61 to \$204.18 per square foot of above grade living area, land included. Based on this evidence, the appellant requested a reduction in the subject's assessment.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$82,210. The subject's assessment reflects a market value of \$246,951 or \$176.39 per square foot of living area, land included, when using the 2016 three-year average median level of assessment for DuPage County of 33.29% as determined by the Illinois Department of Revenue.

In response to the appellant's submission, the board of review submitted a grid analysis, property record cards and PTAX-203 Real Estate Transfer Declarations for the appellant's comparables. The board of review also argued that the appellant's comparables are located in different neighborhoods than the subject.

In support of its contention of the correct assessment, the board of review submitted a grid analysis on three comparable sales located in the same neighborhood and condominium complex as the subject. The comparables are described as condominiums ranging in size from 1,275 to 1,360 square feet of living area. The comparables were built in 1968. Each comparable has central air conditioning and a fireplace. Two comparables have a detached garage. The comparables sold in August and October 2014 for prices ranging from \$183,500 to \$249,000 or from \$134.93 to \$194.12 per square foot of living area, including land. 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 a reduction in the subject's assessment is not warranted.

The Board finds the parties submitted eighteen comparable sales for consideration. The Board gave less weight to the appellant's comparables for their locations in different neighborhoods than the subject. In addition, eight of the appellant's comparables sold in 2013 which were less reflective of market value as of the subject's January 1, 2016 assessment date.

The Board finds the best evidence of market value to be the comparables located in the same condominium complex as the subject submitted by the board of review. These three comparables are most similar to the subject in dwelling size, design, age and features. The comparables sold in August and October 2014 for prices ranging from \$183,500 to \$249,000 or from \$134.93 to \$194.12 per square foot of living area, including land. The subject's assessment reflects a market value of \$246,951 or \$176.39 per square foot of living area, including land which falls within the range established by the most similar comparable sales in this record.

Based on this record, the Board finds the appellant failed to demonstrate by a preponderance of the evidence that the subject was overvalued 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.

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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: July 16, 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

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