



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

APPELLANT: Asad Zaman
DOCKET NO.: 18-05176.001-R-1
PARCEL NO.: 06-20-415-019

The parties of record before the Property Tax Appeal Board are Asad Zaman, the appellant, by attorney George N. Reveliotis, of Reveliotis Law, P.C. in Park Ridge; 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: \$34,640
IMPR.: \$122,770
TOTAL: \$157,410

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 2018 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 2,520 square feet of living area. The dwelling was constructed in 2002. Features of the home include a full basement with finished area, central air conditioning, two fireplaces and a three-car garage with 742 square feet of building area. The property has a 12,987 square foot site and is located in Lombard, York 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 \$450,000 as of January 1, 2017. The appraisal was prepared by Nicholas J. Mulligan, a Certified Residential Real Estate Appraiser, for ad valorem purpose only. The appraiser described the subject property as being in good condition and no repairs were noted.

In estimating the market value of the subject property, the appellant's appraiser developed the sales comparison approach to value using five comparable sales improved with Traditional dwellings of frame and brick exterior construction that range in size from 2,191 to 2,885 square feet of living area. The dwellings range in age from approximately 17 to 60 years old. Each comparable has a full basement with four having finished area, central air conditioning and a two-car or a three-car garage. Three comparables each have one fireplace. These properties have sites ranging in size from 7,477 to 20,552 square feet of land area and are located from .04 to .76 miles from the subject property. The sales occurred from December 2015 to October 2016 for prices ranging from \$385,000 to \$470,000 or from \$150.78 to \$188.04 per square foot of living area, inclusive of the land. After applying adjustments to the comparables for differences from the subject, the appraiser arrived at an estimated market value of \$450,000 as of January 1, 2017. The appellant requested the subject's assessment be reduced to approximately reflect the appraised value.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$157,410. The subject's assessment reflects a market value of \$472,987 or \$187.69 per square foot of living area, land included, when using the 2018 three-year average median level of assessment for DuPage County of 33.28% as determined by the Illinois Department of Revenue. The board of review asserted that the 2017 assessment was revised to reflect the appraised value and the 2018 assessment reflects the appraised value plus application of the 2018 equalization factor of 1.0494.¹

In support of the subject's assessment, the board of review submitted information on six comparable sales improved with two-story dwellings of frame or frame and brick exterior construction that range in size from 2,191 to 3,034 square feet of living area. The homes were built from 1991 to 2006. Each comparable has an unfinished basement, central air conditioning, a fireplace and a two-car or a three-car garage. The comparables have sites ranging in size from 7,534 or 12,241 square feet of land area. A map depicting the locations of both parties' comparables in relation to the subject was submitted. The comparables sold from January 2016 to June 2018 for prices ranging from \$436,500 to \$560,000 or from \$179.14 to \$222.08 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.

As to the appellant's appraisal of the subject property, the Board gave less weight to the appraiser's conclusion of value as the appraiser used sales that occurred from December 2015 to October 2016

¹ See 35 ILCS 200/16-80.

which are dated and thus, less likely to be reflective of the subject's market value as of the January 1, 2018 assessment date when more recent sales similar to the subject were available and provided by the board of review. In addition, the appraiser utilized a comparable that was a significantly older dwelling than the subject. These factors undermine the appraiser's final value conclusion.

The Board also gave less weight to board of review comparables #3, #4 and #5 as their dated sales in 2016 are less likely to be reflective of the subject's market value as of the assessment date at issue and/or having a larger dwelling size.

The Board finds the best evidence of market value to be comparables #1, #2 and #6 submitted by the board of review. These comparables sold proximate in time to the assessment date at issue. These comparables are relatively similar to the subject location, dwelling size, design and features. These comparables sold from July 2017 to June 2018 for prices ranging from \$436,500 to \$535,000 or from \$181.46 to \$222.08 per square foot of living area, including land. The subject's assessment reflects a market value of \$472,987 or \$187.69 per square foot of living area, including land, which falls within the range as established by the best comparable sales in the record and is well supported given the subject's larger lot and garage. After considering adjustments to the comparables for differences when compared to the subject, the Board finds the appellant did not prove by a preponderance of the evidence that the subject's estimated market value as reflected by the assessment was excessive and therefore, 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:

March 16, 2021



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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