



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

APPELLANT: Mike Lane
DOCKET NO.: 19-08869.001-R-1
PARCEL NO.: 07-13-106-010

The parties of record before the Property Tax Appeal Board are Mike Lane, 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: \$81,990
IMPR.: \$235,120
TOTAL: \$317,110

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 2019 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 2.5-story dwelling of brick and frame exterior construction with 3,980 square feet of living area. The dwelling was constructed in 2005. Features of the home include a basement, central air conditioning, a fireplace,¹ and a 2-car garage. The property has an 8,261 square foot site and is located in Naperville, Naperville Township, DuPage County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on five comparable sales, which were presented on two pages and are renumbered as comparables #1 through #5, together with a listing sheet for each of these comparable sales. The comparables are located within the same assessment neighborhood code as the subject property. The parcels range in size from 7,149 to 19,602 square feet of land area

¹ Additional details regarding the subject not reported by the appellant are found in the subject's property record card presented by the board of review.

and are improved with 2.5-story homes of frame or brick and frame exterior construction ranging in size from 3,981 to 4,877 square feet of living area. The dwellings were built from 2003 to 2005. Each home has a basement, four of which have finished area, central air conditioning, one or two fireplaces,² and a 2-car, 3-car, or 4-car garage. The comparables sold from September 2016 to April 2018 for prices ranging from \$770,000 to \$980,000 or from \$187.62 to \$229.51 per square foot of living area, including land. Based on this evidence the appellant requested a reduction in the subject's assessment to \$273,852 which would reflect a market value of \$821,638 or \$206.44 per square foot of living area, including land, at the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$317,110. The subject's assessment reflects a market value of \$952,568 or \$239.34 per square foot of living area, land included, when using the 2019 three year average median level of assessment for DuPage County of 33.29% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales, where comparable #1 is actually the subject property and comparable #5 is the same property as the appellant's comparable #3. The board of review also submitted a map depicting the locations of both parties' comparables in relation to the subject and property record cards for both parties' comparables. Comparables #2 through #5 are located within the same assessment neighborhood code as the subject property. These parcels range in size from 8,886 to 12,997 square feet of land area and are improved with 2-story or 2.5-story homes of frame or brick and frame exterior construction ranging in size from 3,966 to 4,362 square feet of living area. The dwellings were built from 2004 to 2011. Each home has a basement with finished area, a fireplace, and a 2-car or 3-car garage. The comparables sold from August 2017 to June 2018 for prices ranging from \$980,000 to \$1,175,000 or from \$229.51 to \$269.37 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 record contains a total of eight comparable sales, with one common sale, and the June 2018 sale of the subject property for the Board's consideration. The Board gives less weight to the appellant's comparables #1 and #2, the appellant's comparable #3/board of review's comparable #5, and the board of review's comparable #4, which sold less proximate in time to the January 1,

² Additional details regarding these comparables not reported by the appellant are found in their property record cards presented by the board of review.

2019 assessment date. The Board gives less weight to the appellant's comparable #4, which is a much larger home than the subject dwelling, and to the appellant's comparable #5, due to significant differences from the subject in lot size and garage size.

The Board finds the best evidence of market value to be the June 2018 sale of the subject property and the board of review's comparables #2, and #3, which are relatively similar to the subject in dwelling size, lot size, age, location, and features. These most similar comparables sold in March and June 2018 for prices of \$1,175,000 and \$1,050,000 or \$269.37 and \$264.75 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$952,568 or \$239.34 per square foot of living area, including land, which is below the range established by the best comparable sales in this record and is also below the June 2018 sale price of the subject property. Based on this evidence and after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds 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: June 21, 2022



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

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Mike Lane, by attorney:
George N. Reveliotis
Reveliotis Law, P.C.
1030 Higgins Road
Suite 101
Park Ridge, IL 60068

COUNTY

DuPage County Board of Review
DuPage Center
421 N. County Farm Road
Wheaton, IL 60187