



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

APPELLANT: Mike Lane
DOCKET NO.: 19-08886.001-R-1
PARCEL NO.: 08-30-207-010

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: \$57,730
IMPR.: \$34,220
TOTAL: \$91,950

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 split-level dwelling of brick and aluminum siding exterior construction with 1,329 square feet of living area.¹ The dwelling was constructed in 1965. Features of the home include a finished lower level and a 2-car garage. The property has an approximately 10,082 square foot site and is located in Naperville, Lisle Township, DuPage County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant completed Section IV – Recent Sales Data of the Residential Appeal petition disclosing the subject property was purchased on March 20, 2017 for a price of \$260,000. The appellant stated that the subject property was sold through a realtor and was advertised for sale for 84 days on the

¹ Details of the subject property not provided by appellant in the petition are found in both the grid analysis and the listing sheet presented by the appellant.

Multiple Listing Service. The appellant further stated that the subject property was purchased by contract for deed dated February 21, 2017. In further support, the appellant submitted a listing sheet for the subject property and copies of an ALTA Settlement Statement, a Trustee's Deed, a Seller's Closing Statement, an ALTA statement, an Escrow Disbursement Statement, and a Waiver of Settlement Agent Responsibility.

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 of \$91,950. The subject's assessment reflects a market value of \$278,721 or \$209.72 per square foot of living area, land included, when using the 2019 three year average median level of assessment for DuPage County of 32.99% as determined by the Illinois Department of Revenue.

The board of review submitted information on four comparables sales, a map showing the location of the board of review's comparables compared to the subject, and a photograph of the subject property. The four comparables are located from 0.02 to 0.30 of a mile from the subject property and within the same assessment neighborhood code as the subject property. The parcels range in size from 9,616 to 10,900 square feet of land area and are improved with split-level homes of brick or frame construction ranging in size from 1,302 to 1,480 square feet of living area. The dwellings were built from 1963 to 1966. The homes each have a basement/lower level with finished area and a garage ranging in size from 440 to 580 square feet of building area. Two of the homes each have central air conditioning and three of the homes each have one fireplace. The comparables were sold from March 2018 to June 2019 for prices ranging from \$295,000 to \$368,000 or from \$225.71 to \$248.65 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 the 2017 sale of the subject and a total of four comparable sales for the Board's consideration. The Board finds the best evidence of market value in the record to be the board of review's comparables, which are relatively similar to the subject in location, style, dwelling size, most features, age, and land area. These properties also sold proximate in time to the assessment date at issue. The comparables sold for prices ranging from \$295,000 to \$368,000 or from \$225.71 to \$248.65 per square foot of living area, including land. The subject's assessment reflects a market value of \$278,721 or \$209.72 per square foot of living area, including land, which is below the range established by the best comparable sales in this record.

The Board gave little weight to the subject's sale due to the fact the sale did not occur proximate in time to the assessment date at issue. Based on this record and after considering appropriate adjustments to the best comparables for differences, the Board finds the subject's assessment is reflective of market value 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.



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:

February 15, 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

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