



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

APPELLANT: Venoodhar & Madhuri Reddy
DOCKET NO.: 19-08970.001-R-1
PARCEL NO.: 09-24-203-015

The parties of record before the Property Tax Appeal Board are Venoodhar & Madhuri Reddy, the appellants, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; and the DuPage County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** 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: \$183,840
IMPR.: \$120,990
TOTAL: \$304,830

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 two-story dwelling of frame exterior construction¹ with 4,395 square feet of living area. The dwelling was constructed in 1999. Features of the home include a full basement with finished area, central air conditioning, two fireplaces, and a 746 square foot garage. The property has a 30,190 square foot site and is located in Burr Ridge, Downers Grove Township, DuPage County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted information on six comparable sales. The comparables are located from 0.09 to 0.54 of a mile from the subject property and five comparables are located within the same assessment neighborhood code as the subject property. The parcels range in size from 20,564 to

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

26,039 square feet of land area² and are improved with two-story homes of brick exterior construction ranging in size from 4,000 to 4,736 square feet of living area. The dwellings were built from 1993 to 2005. Each home has a full basement, five of which have finished area, central air conditioning, one to three fireplaces, and a garage ranging in size from 704 to 970 square feet of building area. The comparables sold from December 2017 to August 2019 for prices ranging from \$500,000 to \$913,000 or from \$105.57 to \$223.12 per square foot of living area, including land. Based on this evidence the appellants requested a reduction in the subject's assessment to \$304,829 which would reflect a market value of \$914,578 or \$208.10 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 \$350,100. The subject's assessment reflects a market value of \$1,061,231 or \$241.46 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.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales, consisting of five parcel numbers, together with a grid analysis of the appellants' comparables, a map depicting the locations of both parties' comparables in relation to the subject, property record cards for the parties' comparables, and a brief contending that several of the appellants' comparables sold after the January 1, 2019 assessment date and that the appellants' comparable #3 had a fire in August 2017 and sold in December 2017.

The board of review's comparables are located from 0.16 to 0.52 of a mile from the subject property and two comparables are located within the same assessment neighborhood code as the subject property. Comparables #4 and #5 are adjoining associated properties. The parcels range in size from 4,792 to 25,803 square feet of land area and are improved with two-story homes of brick exterior construction ranging in size from 3,857 to 4,776 square feet of living area. The dwellings were built from 1988 to 2000. Each home has a basement, two of which have finished area, central air conditioning, two or three fireplaces, and a garage ranging in size from 602 to 912 square feet of building area. The comparables sold from March 2016 to November 2018 for prices ranging from \$900,000 to \$1,050,000 or from \$215.66 to \$254.05 per square foot of living area, including land. Based on this evidence the board of review requested confirmation of the subject's assessment.

In written rebuttal, the appellants argued the board of review's comparables were not similar to the subject in dwelling size or sold too remote in time from the January 1, 2019 assessment date to be indicative of market value as of the assessment date.

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

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

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 met this burden of proof and a reduction in the subject's assessment is warranted.

The record contains a total of ten comparable sales, consisting of eleven parcels, for the Board's consideration. The Board gives less weight to the appellants' comparable #3 and the board of review's comparables #2 through #5, which sold more remote in time from the January 1, 2019 assessment date.

The Board finds the best evidence of market value to be the appellants' comparables #1, #2, #4, #5, and #6 and the board of review's comparable #1, which are relatively similar to the subject in dwelling size, site size, age, location, and features. These most similar comparables sold from May 2018 to August 2019 for prices ranging from \$775,000 to \$913,000 or from \$191.78 to \$233.34 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,061,231 or \$241.46 per square foot of living area, including land, which is above the range established by the best comparable sales in this record. 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 commensurate with the appellants' request³ is justified.

³ Recognizing the DuPage County board of review's practice of rounding assessments to the nearest tenth.

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: July 19, 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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