



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

APPELLANT: Sreeram & Rasika Reddy  
DOCKET NO.: 20-06414.001-R-1  
PARCEL NO.: 12-02-04-109-027-0000

The parties of record before the Property Tax Appeal Board are Sreeram & Rasika Reddy, the appellants, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; and the Will 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 Will County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$90,855  
**IMPR.:** \$260,952  
**TOTAL:** \$351,807

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants timely filed the appeal from a decision of the Will County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2020 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 part 2-story and part 1-story dwelling<sup>1</sup> of brick exterior construction with 4,827 square feet of living area. The dwelling was constructed in 2002. Features of the home include an above-ground basement with finished area, central air conditioning, three fireplaces, and a 727 square foot garage. The property has a 20,327 square foot site and is located in Naperville, DuPage Township, Will County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted information on five comparable sales located within 0.66 of a mile from the subject. The comparables are improved with 2-story homes ranging in size from 3,712 to 6,166

---

<sup>1</sup> Additional details regarding the subject not reported by the appellants are found in the subject's property record card presented by the board of review which the Board finds to be the best evidence of the subject's features and amenities and was not refuted by the appellants in written rebuttal

square feet of living area. The dwellings were built from 1986 to 2006. Each home has a basement, one of which has finished area,<sup>2</sup> two of which are above-ground basements, and one of which is a walkout basement. Each home also features central air conditioning, a fireplace, and a garage ranging in size from 655 to 870 square feet of building area. The comparables sold from April to October 2019 for prices ranging from \$560,700 to \$1,075,000 or from \$128.04 to \$175.34 per square foot of living area, including land.

Based on this evidence the appellants 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 \$351,807. The subject's assessment reflects a market value of \$1,054,261 or \$218.41 per square foot of living area, land included, when using the 2020 three year average median level of assessment for Will County of 33.37% 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 located from 0.11 of a mile to 1.78 miles from the subject. Comparable #4 is the same property as the appellants' comparable #4. The parcels range in size from 13,282 to 23,404 square feet of land area. The board of review reported one comparable is in a wooded cul-de-sac, one comparable backs to park woods, one comparable backs to a pond, and one comparable is in a cul-de-sac. The comparables are improved with part 2-story and part 1-story or 2-story homes of brick or brick, stone, and frame exterior construction ranging in size from 4,534 to 5,133 square feet of living area. The dwellings were built from 1998 to 2006. Each home has a basement with finished area, two of which are above-ground basements and one of which is a walkout basement. Each home also features central air conditioning, one or two fireplaces, and a garage ranging in size from 742 to 941 square feet of building area. The comparables sold from April 2018 to July 2019 for prices ranging from \$900,000 to \$1,100,000 or from \$175.34 to \$238.92 per square foot of living area, including land.

The board of review submitted a brief asserting the subject has a large, wooded lot. The board of review argued the appellants' comparables lack salient details regarding their features and amenities and their sites. The board of review further argued the appellants' comparables #1 and #2 are not in similar subdivisions and are not similar to the subject in site size and quality of construction, the appellants' comparables #3 and #5 are not similar to the subject in dwelling size, and the appellants' comparable #4 is in a cul-de-sac that is not wooded like the subject but is otherwise similar to the subject.

Based on this evidence the board of review requested the subject's assessment be sustained.

In written rebuttal, the appellants argued the board of review's comparables #1, #2, and #3 differ from the subject in design, location, and/or sold less proximate in time to the assessment date. The appellants also presented a map depicting the locations of the appellants' comparables in relation to the subject.

---

<sup>2</sup> The board of review reported comparable #4 which is common to both parties has finished basement area, which was not refuted by the appellants in written rebuttal.

### **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 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 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, for the Board's consideration. The Board gives less weight to the appellants' comparables #1, #2, #3, and #5, due to significant differences from the subject in dwelling size, age, and/or basement finish. The Board gives less weight to the board of review's comparables #2 and #3, which are located more than one mile from the subject and sold less proximate in time to the assessment date than other comparables in this record.

The Board finds the best evidence of market value to be the appellants' comparable #4/board of review's comparable #4 and the board of review's comparable #1, which are similar to the subject in dwelling size, age, location, site size, and features. These two most similar comparables sold for prices of \$900,000 and \$1,100,000 or for \$175.34 and \$238.92 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,054,261 or \$218.41 per square foot of living area, including land, which is bracketed 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 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: May 16, 2023



\_\_\_\_\_  
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

Sreeram & Rasika Reddy, by attorney:  
Jessica Hill-Magiera  
Attorney at Law  
790 Harvest Drive  
Lake Zurich, IL 60047

COUNTY

Will County Board of Review  
Will County Office Building  
302 N. Chicago Street  
Joliet, IL 60432