



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

APPELLANT: Ankit Mahajan
DOCKET NO.: 20-07552.001-R-1
PARCEL NO.: 01-11-403-015

The parties of record before the Property Tax Appeal Board are Ankit Mahajan, the appellant, by attorney Dimitrios Trivizas, of Dimitrios P. Trivizas, Ltd. in Skokie; 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: \$28,780
IMPR.: \$85,990
TOTAL: \$114,770

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 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 two-story dwelling of vinyl exterior construction with 2,336 square feet of living area. The dwelling was constructed in 1993. Features of the home include an unfinished basement, central air conditioning and a 480 square foot 2-car garage. The property has an approximately 9,047 square foot site and is located in Bartlett, Wayne Township, DuPage County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales located within 0.12 of a mile from the subject property. The comparables have sites that range in size from 8,183 to 10,295 square feet of land area and are improved with two-story dwellings of frame, vinyl or aluminum exterior construction that range in size from 1,749 to 2,336 square feet of living area. The dwellings

were built in 1993 or 1994. Three comparables have a basement with one having finished area.¹ Each dwelling has central air conditioning, one fireplace and a 2-car garage. The properties sold from June 2017 to August 2019 for prices ranging from \$272,000 to \$325,000 or from \$116.44 to \$182.96 per square foot of living area, land included. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$103,083 which reflects a market value of \$309,280 or \$132.40 per square foot of living area, land included, when applying 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 \$114,770. The subject's assessment reflects a market value of \$343,623 or \$147.10 per square foot of living area, land included, when using the 2020 three-year average median level of assessment for DuPage County of 33.40% as determined by the Illinois Department of Revenue.

The board of review critiqued the appellant's comparables arguing comparable #1 needed updating prior to its 2019 sale and also lacks a basement. The board of review critiqued appellant comparable #3 as being a "much smaller home" when compared to the subject and that appellant comparable #4 sold in June 2017, 2½ years prior to the January 1, 2020 assessment date.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales located within 0.20 of a mile from the subject property. Board of review comparable #4 is the same property as the appellant's comparable #2. The comparables have sites that range in size from 8,183 to 11,384 square feet of land area and are improved with two-story dwellings of vinyl or aluminum exterior construction that range in size from 2,140 to 2,494 square feet of living area. The homes were built in 1993 or 1994. Each comparable has a basement, with three having finished area. Each dwelling has central air conditioning and a garage ranging in size from 448 to 634 square feet of building area. Three comparables each have one fireplace. The properties sold from January to October 2019 for prices ranging from \$325,000 to \$425,000 or from \$151.87 to \$173.37 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 eight comparable sales for the Board's consideration, as one property was common to both parties. The Board gives less weight to each of the appellant's comparables which differ from the subject in foundation type, finished basement area, dwelling size and/or

¹ The Board finds appellant comparable #2, also submitted by the board of review, to have a 50% finished basement which was not refuted by the appellant.

sold in 2017, less proximate in time to the January 1, 2020 assessment date than other comparables in the record. The Board gives less weight to board of review comparables #2, #3 and #4, including the common property, which are reported to have finished basement area in contrast to the subject's unfinished basement.

The Board finds the best evidence of market value to be board of review comparables #1 and #5 which are more similar to the subject in location, age, design, dwelling size and other features. These two comparables sold in June and October 2019 for prices of \$343,000 and \$425,000 or for \$157.70 and \$170.41 per square foot of living area, including land. The subject's assessment reflects a market value of \$343,623 or \$147.10 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record on an overall market value basis and below the two best comparables on a per square foot basis. After considering appropriate adjustments to the comparables for differences from the subject, the Board finds the subject's assessment a reduction in the subject's assessment is not warranted.

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

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