



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

APPELLANT: Mohamed Katerji
DOCKET NO.: 20-08045.001-R-1
PARCEL NO.: 10-01-401-058

The parties of record before the Property Tax Appeal Board are Mohamed Katerji, 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: \$128,060
IMPR.: \$210,730
TOTAL: \$338,790

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 2-story dwelling of brick and stone exterior construction with 4,770 square feet of living area.¹ The dwelling was constructed in 2015. Features of the home include a basement with finished area, central air conditioning, a fireplace, and a 1,012 square foot garage. The property has a 31,237 square foot site and is located in Burr Ridge, Downers Grove Township, DuPage County.

The appellant's appeal is based on overvaluation. In support of this argument the appellant submitted evidence disclosing the subject property was purchased on September 8, 2017 for a price of \$1,099,000. The appellant completed Section IV – Recent Sale Data of the appeal

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 which the Board finds to be the best evidence of the subject's features and amenities.

petition disclosing the property was sold by a realtor, the property was advertised through the Multiple Listing Service for 846 days, and the sale was not due to foreclosure or by contract for deed. The appellant submitted copies of a settlement statement indicating a purchase price of \$879,000 and payment of a realtor's commission, a Warranty Deed, and a listing sheet indicating an original listing price of \$1,099,000, a sale price of \$879,000, and a time on the market of 481 days.

Based on this evidence, the appellant requested a reduction in the subject's assessment to \$299,637 which would reflect a market value of \$899,000 or \$188.47 per square foot of living area, including land, 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 \$338,790. The subject's assessment reflects a market value of \$1,014,341 or \$212.65 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.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located from 0.94 of a mile to 3.30 miles from the subject. The parcels range in size from 20,621 to 26,039 square feet of land area and are improved with 2-story homes of brick or frame exterior construction ranging in size from 4,108 to 5,001 square feet of living area. The dwellings were built from 1995 to 2005. Each home has a basement, three of which have finished area, central air conditioning, one or two fireplaces, and a garage ranging in size from 781 to 992 square feet of building area. The comparables sold from November 2018 to May 2020 for prices ranging from \$890,000 to \$1,150,000 or from \$200.76 to \$242.82 per square foot of living area, including land. Based on this evidence the board of review requested the subject's assessment be sustained.

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 evidence of a September 2017 sale of the subject property and four comparable sales presented by the board of review. 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 and it was unclear from the record whether the sale was an arm's length transaction. The appellant did not disclose whether the sale was between related parties and did not submit a Real Estate Transfer Declaration to indicate whether the sale was between related parties. Moreover, the appellant presented inconsistent information regarding the sale, making this evidence less credible.

The Board finds the best evidence of market value in the record to be the board of review's comparables #1, #2, and #4, which are similar to the subject in dwelling size, design, and features and sold proximate in time to the assessment date. The Board gave less weight to the board of review's comparable #3, which sold less proximate in time to the assessment date and is a substantially smaller home than the subject without finished basement area that is a feature of the subject. These most similar comparables sold for prices ranging from \$900,000 to \$1,150,000 or from \$200.76 to \$242.82 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,014,341 or \$212.65 per square foot of living area, including land, which is within the range established by the best comparable sales in this record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, 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:

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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