



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

APPELLANT: Rajeev & Rashmi Jain
DOCKET NO.: 20-08141.001-R-1
PARCEL NO.: 09-13-105-013

The parties of record before the Property Tax Appeal Board are Rajeev & Rashmi Jain, 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 **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: \$125,780
IMPR.: \$115,730
TOTAL: \$241,510

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 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 frame exterior construction with 2,864 square feet of living area. The dwelling was constructed in 1992. Features of the home include an unfinished basement, central air conditioning, one fireplace and a 420 square foot garage.¹ The property has an approximately 13,944 square foot site and is located in Hinsdale, 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 three comparable sales located within 0.14 of a mile from the subject property. The comparables are improved with 2-story dwellings ranging in size from 2,731 to 3,260 square feet of living area. The dwellings were built in 1987 or 1994. Each

¹ The Board finds the best description of the subject property was found in its property record card, submitted by the board of review, which contains a sketch of the subject improvements with dimensions.

comparable has a basement and a garage ranging in size from 462 to 640 square feet of building area.² The properties sold from June 2019 to June 2020 for prices ranging from \$605,000 to \$762,500 or from \$218.88 to \$233.90 per square foot of living area, land included. Based on this evidence, the appellants requested the subject's total assessment be reduced to \$211,467 which reflects a market value of \$634,467 or \$221.53 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 \$241,510. The subject's assessment reflects a market value of \$723,084 or \$252.47 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's evidence included a Comparable Report which disclosed the appellants' comparables have sites ranging in size from 10,033 to 15,825 square feet of land area and that comparables #1 and #2 each have a finished basement. Each comparable also has central air conditioning and one fireplace which was omitted from the appellants' grid analysis.

In support of its contention of the correct assessment the board of review submitted information on three comparable sales located within 0.21 of a mile from the subject property. The comparables have sites that range in size from 10,650 to 21,000 square feet of land area and are improved with 2-story dwellings of frame, brick, or frame and brick exterior construction ranging in size from 2,956 to 3,311 square feet of living area. The homes were built from 1990 to 1999. Each comparable has a basement, one of which has finished area. Each dwelling has central air conditioning, one or two fireplaces and a garage ranging in size from 539 to 766 square feet of building area. The properties sold from September 2018 to June 2020 for prices ranging from \$830,000 to \$900,000 or from \$253.70 to \$297.32 per square foot of living area, land included. Based on this evidence, the board of review requested the subject's assessment be confirmed.

In rebuttal, the appellants critiqued board of review comparables #1 and #3 arguing these properties are not comparable to the subject due to differences in dwelling size or a remote 2018 sale date. The appellants submitted two rebuttal grids, one grid with both parties' comparables and one grid containing the appellants' suggested "best comparable sales for further clarity."

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.

² The Board finds the best description of garage size for appellants comparable #1 was found in the Comparable Report submitted by the board of review which reports a garage size of 462 square feet of building area.

The parties submitted six comparable sales for the Board's consideration. The Board gives less weight to appellants' comparables #1 and #2 along with board of review comparables #1 and #2 which have finished basement area in contrast to the subject's unfinished basement and/or sold in 2018, less proximate to the January 1, 2020 assessment date than other properties in the record.

The Board finds the best evidence of market value to be appellants' comparable #3 and board of review comparable #3 which are more similar to the subject in location, age, design, unfinished basement and other features. Although these two comparables have a slightly larger dwelling size when compared to the subject suggesting a downward adjustment is needed to make these properties more equivalent to the subject. These two comparables sold in August 2019 and April 2020 for prices of \$762,500 and \$840,000 or for \$233.90 and \$253.70 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$723,084 or \$252.47 per square foot of living area, including land, which falls below the two best comparable sales in this record on an overall market value basis and is bracketed by the two best comparables on a per square foot basis. Given the subject's slightly smaller dwelling size its lower overall market value appears logical. Therefore, after considering appropriate adjustments to the two best comparables for differences from the subject, the Board finds the subject's assessment is justified and 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:

February 20, 2024



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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