

FINAL ADMINISTRATIVE DECISION ILLINOIS PROPERTY TAX APPEAL BOARD

APPELLANT: Navaneeth Kumar Vankadari

DOCKET NO.: 20-08429.001-R-1 PARCEL NO.: 07-18-103-086

The parties of record before the Property Tax Appeal Board are Navaneeth Kumar Vankadari, the appellant, 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: \$58,480 **IMPR.:** \$133,400 **TOTAL:** \$191,880

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 frame and brick exterior construction with 3,579 square feet of living area. The dwelling was constructed in 1994. Features of the home include a partially finished basement with a 1,368 square foot recreation room, central air conditioning, a fireplace, and a 3-car garage. The property is located in Aurora, Naperville Township, DuPage County.²

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a grid analysis with information on eight comparable sales located within .95

¹ Some descriptive characteristics of the subject and the appellant's comparables not disclosed by the appellant were drawn from the property record cards and grid data submitted by the board of review which were not contested by appellant's counsel in rebuttal.

² Neither party disclosed the subject property's lot size.

of a mile from the subject and in the same assessment neighborhood as the subject property. The comparables have sites ranging in size from 6,402 to 13,034 square feet of land area that are improved with 2-story dwellings of frame or frame and brick exterior construction that range in size from 3,437 to 3,637 square feet of living area. The dwellings were built from 1989 to 1998. Each comparable features a basement, two with finished area. Each comparable also has central air conditioning, one or two fireplaces, and a 3-car garage. The comparables sold from January 2019 to November 2020 for prices ranging from \$390,000 to \$532,500 or from \$109.80 to \$148.89 per square foot of living area, including land. Based on this evidence, the appellant requested the subject's total assessment be reduced.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$191,880. The subject's assessment reflects a market value of \$574,491 or \$160.52 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 a grid analysis with information on seven comparable sales located within the same assessment neighborhood code as the subject property. The comparables have parcels ranging in size from approximately 12,310 to 23,136 square feet of land area. The sites are improved with 2-story dwellings of frame or frame and brick exteriors that range in size from 3,254 to 3,863 square feet of living area. The dwellings were built from 1992 to 1999. Each dwelling features a basement, two with finished area. Each home also has central air conditioning, one to three fireplaces, and a 2-car or a 3-car garage. The comparables sold from April 2018 to September 2020 for prices ranging from \$550,000 to \$850,000 or from \$149.54 to \$261.22 per square foot of living area, including land. Based on this evidence, the board of review requested the assessment be sustained.

In rebuttal, the appellant's counsel critiqued some of the board of review comparables based on differing dwelling sizes or remote sale date. Appellant's counsel also contended that two comparables support a reduction based on price per square foot of living area.

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 a total of fifteen comparable sales submitted by the parties in support of their respective positions before the Property Tax Appeal Board. After analyzing the evidence submitted, the Board gave less weight to the appellant's comparables #1 through #5, and #8 along with board of review comparables #2 through #6 based on these comparables lacking a finished basement area, dissimilar to the subject's 1,368 square foot recreation room. The Board also gave less weight to board of review comparable #7 based on this sale occurring in April

2018 which is too remote it time from the assessment date at issue and given that sales more proximate to the lien date are available.

On this record, the Board finds the best evidence of market value to be appellant's comparables #7 and board of review comparable #1 which each have finished basement area like the subject's basement, and each sold proximate in time to the lien date at issue in addition to being overall similar to the subject in location, lot size, design, age, and many features. The best overall comparables in the record sold in September and November 2020 for prices of \$525,000 and \$780,000 or from \$148.89 to \$201.92 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$574,491 or \$160.52 per square foot of living area, including land, which is bracketed by the two best comparable sales in this record both in terms of overall value and on a per square foot of living area basis. After considering adjustments to the best comparables in the record for differences from the subject, the Board finds that the appellant did not demonstrate by a preponderance of the evidence that the subject property is overvalued and, therefore, a reduction 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.

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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
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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 <u>PETITION AND EVIDENCE</u> 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

Navaneeth Kumar Vankadari, by attorney: Jessica Hill-Magiera Attorney at Law 790 Harvest Drive Lake Zurich, IL 60047

COUNTY

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