



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

APPELLANT: Mike Lane
DOCKET NO.: 21-06896.001-R-1
PARCEL NO.: 07-24-418-021

The parties of record before the Property Tax Appeal Board are Mike Lane, 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: \$49,880
IMPR.: \$57,090
TOTAL: \$106,970

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 2021 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 split-level dwelling of frame exterior construction with 1,152 square feet of above-ground living area. The dwelling was constructed in 1959. Features of the home include a finished lower level, central air conditioning, a fireplace¹, and a 2-car garage. The property has a 9,130 square foot site and is located in Naperville, Naperville Township, DuPage County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on three comparable sales together with an MLS listing sheet associated with each comparable sale. The comparables are located within the same assessment neighborhood code as the subject property. The parcels range in size from 10,008 to 10,238

¹ Additional details regarding the subject property not reported by the appellant are found in the subject's property record card submitted by the board of review.

square feet of land area and are improved with split-level homes of frame or brick and frame construction ranging in size from 1,200 to 1,278 square feet of above-ground living area. Each comparable is reported to have a lower level with finished area, central air conditioning, and a 2-car garage. The comparables sold from April 2019 to December 2020 for prices ranging from \$300,000 to \$329,900 or from \$240.38 to \$259.79 per square foot of above-ground living area, including land. Based on this evidence, the appellant 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 \$106,970. The subject's assessment reflects a market value of \$319,982 or \$277.76 per square foot of above-ground living area, land included, when using the 2021 three-year average median level of assessment for DuPage County of 33.43% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales located within the same assessment neighborhood code as the subject property, along with a map depicting the locations of both parties' comparables in relation to the subject, and the property record cards for the subject and each of the parties' comparables. The comparables have parcels ranging in size from 8,648 to 15,309 square feet of land area and are improved with split-level homes of frame or brick and frame construction ranging in size from 1,200 to 1,278 square feet of above-ground living area. The dwellings were built from 1959 to 1961. Each home has a finished lower level, central air conditioning, and a 2-car garage. Four comparables each have a fireplace. The comparables sold from August 2019 to March 2021 for prices ranging from \$344,000 to \$385,000 or from \$277.64 to \$320.83 per square foot of above-ground living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

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 Board finds the parties submitted a total of eight comparable sales for the Board's consideration. The Board gave less weight to the appellant's comparables #2 and #3 along with the board of review's comparable #3 due to their sales dates occurring in 2019, which is less proximate in time to the January 1, 2020 assessment date at issue than the remaining sales in this record.

The Board finds the best evidence of market value to be appellant's comparable #1 along with board of review comparables #1, #2, #4 and #5, which sold proximate in time to the lien date at issue and are similar to the subject in location, design, age, dwelling size, lot size, and most features. These most similar comparables sold from April 2020 to March 2021 for prices ranging from \$311,750 to \$385,000 or from \$259.79 to \$320.83 per square foot of above-ground living

area, including land. Excluding appellant's comparable #1 and board of review comparable #1 which are at the low end and high end of the range of values, respectively, yields a tighter range from \$344,000 to \$362,000 or from \$277.64 to \$283.26 per square foot of above-ground living area. The subject's assessment reflects a market value of \$319,982 or \$277.76 per square foot of above-ground living area, including land, which falls within the range of the best comparable sales in the record and is particularly supported when considering the tighter range of values above. Based on this record, and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds that the appellant did not establish by a preponderance of the evidence that the subject is overvalued and, therefore, no reduction in the subject's assessment is 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: January 16, 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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