



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

APPELLANT: Mike Lane  
DOCKET NO.: 21-06905.001-R-1  
PARCEL NO.: 09-05-107-013

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:** \$40,570  
**IMPR.:** \$64,620  
**TOTAL:** \$105,190

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 1,144 square feet of living area. The dwelling was constructed in 1967. Features of the home include a basement with finished area,<sup>1</sup> central air conditioning and a 528 square foot garage. The property has an approximately 7,500 square foot site and is located in Downers Grove, 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 February 15, 2018 for a price of \$259,900. The appellant completed Section IV – Recent Sale Data disclosing the transaction was not between family members or related corporations, that the subject was sold by

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<sup>1</sup> The Board finds the best description of the subject's basement was found in the Multiple Listing Service (MLS) sheet for the subject, dated May 2018 which was submitted by the board of review and not refuted by the appellant.

the owner with help from a Realtor and was advertised in the Multiple Listing Service (MLS) for a period of 3 days. To support this sale, the appellant submitted a copy of the settlement statement which reiterated the sale date, sale price, and disclosed commissions were paid to real estate agents. Based on this evidence, the appellant requested the subject's assessment be reduced to reflect the purchase price.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$105,190 which reflects a market value of \$314,657 or \$275.05 per square foot of 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 a grid analysis, property record cards and a map depicting the proximity of the subject to the board of review comparable properties. The four comparables are located within close proximity of the subject and have sites ranging in size from 7,260 to 24,420 square feet of land area. The sites are improved with split-level dwellings that range in size from 1,092 to 1,440 square feet of living area. The homes were built from 1956 to 1971. Each comparable has a basement with finished area, central air conditioning and a garage ranging in size from 400 to 484 square feet of building area. One home has a fireplace. The properties sold from July 2020 to June 2021 for prices ranging from \$342,000 to \$496,000 or from \$297.92 to \$389.02 per square foot of living area, land included.

The board of review also submitted written comments arguing the subject property was remodeled after the February 2018 purchase without required permits of the subject property. In support of this argument, the board of review submitted a copy of the Multiple Listing Service (MLS) sheet advertising the subject property as a rental home. The MLS describes the subject as being "beautifully redone" and "Rehab in 2018" including a partially finished basement area not previously assessed by the board of review. 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 appellant submitted evidence documenting a February 2018 sale of the subject property for a price of \$259,900 while the board of review submitted four recent comparable sales and an MLS sheet dated May 2018 which depicts the subject property was rehabbed after the February purchase.

The Board gives little weight to the sale of the subject property which more than 2½ years prior to the January 1, 2021 assessment date at issue. Furthermore, unrefuted evidence in the record depicts the subject was improved after the February 2018 purchase date, suggesting the purchase

price may reflect condition issues. The Board gives less weight to board of review comparables #1 and #2 which differ from the subject in age and/or site size.

The Board finds the best evidence of market value in the record to be board of review comparables #3 and #4 which sold proximate in time to the assessment date at issue and are more similar to the subject in location, age, design, dwelling size and other features. These two best comparables sold for prices of \$429,000 and \$496,000 or for \$297.92 and \$389.02 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$314,657 or \$275.05 per square foot of living area, including land, which falls below the two best comparable sales in this record. Based on this record the Board finds 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:

December 19, 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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