



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

APPELLANT: Dipak Ghosh  
DOCKET NO.: 21-07084.001-R-1  
PARCEL NO.: 08-22-414-025

The parties of record before the Property Tax Appeal Board are Dipak Ghosh, the appellant, by attorney Ryan Schaeffges, of the Law Office of Ryan Schaeffges, P.C. in Wheeling; and the DuPage County Board of Review.<sup>1</sup>

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:** \$73,450  
**IMPR.:** \$131,340  
**TOTAL:** \$204,790

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 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 2-story dwelling of frame and brick exterior construction with 3,085 square feet of living area. The dwelling was built in 1990 and is approximately 31 years old. Features of the home include a partially finished basement, central air conditioning, a fireplace, and an attached garage with 441 square feet of building area.<sup>2</sup> The property has a 10,593 square foot site and is located in Woodridge, Lisle Township, DuPage County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted a grid analysis with information on three comparable sales located within 2 blocks from the subject, and within the same assessment neighborhood code as the subject

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<sup>1</sup> The parties agreed to waive the scheduled in-person hearing in lieu of a written decision based on the evidence contained in the record.

<sup>2</sup> Some descriptive information was drawn from the subject's property record card submitted by the board of review.

property. The comparables have sites ranging in size from 10,020 to 12,217 square feet of land area and are improved with 2-story dwellings of frame and brick exterior construction that range in size from 2,920 to 3,362 square feet of living area. The dwellings are 30 or 31 years old. Each comparable features a partially finished basement, central air conditioning, and a garage ranging in size from 441 to 713 square feet of building area. The comparables sold from May to August 2020 for prices ranging from \$494,000 to \$570,000 or from \$169.18 to \$172.53 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 \$204,790. The subject's assessment reflects a market value of \$612,593 or \$198.57 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 with information on four comparable sales located within .46 of a mile from the subject with two being in the same assessment neighborhood code as the subject property. The comparables have parcels ranging in size from 10,220 to 17,367 square feet of land area. The sites are improved with 2-story dwellings of frame or brick exterior construction that range in size from 2,973 to 3,177 square feet of living area. The dwellings were built from 1990 to 1992. Each comparable features a partially finished basement, central air conditioning, one or two fireplaces, and a garage ranging in size from 440 to 671 square feet of building area. The comparables sold from March 2020 to August 2021 for prices ranging from \$605,000 to \$670,000 or from \$203.49 to \$212.70 per square foot of living area, including land. Based on this evidence, the board of review requested the 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 a total of seven 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 finds that each of the comparables is similar to the subject property in location, design, lot and dwelling sizes, finished basement area, and most features. The parties' comparables sold from March 2020 to August 2021 for prices ranging from \$494,000 to \$670,000 or from \$169.18 to \$212.70 per square foot of living area, including land. The subject's assessment reflects a market value of \$612,593 or \$198.57 per square foot of living area, including land, which is within the range established by the comparable sales in this record both in terms of overall value and on a per square foot basis. After considering adjustments to the 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, no reduction 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.



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Chairman



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Member



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Member

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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: June 27, 2023



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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 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

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

Dipak Ghosh, by attorney:  
Ryan Schaeffges  
Law Office of Ryan Schaeffges, P.C.  
851 Seton Court  
Suite 1A  
Wheeling, IL 60090

COUNTY

DuPage County Board of Review  
DuPage Center  
421 N. County Farm Road  
Wheaton, IL 60187