



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

APPELLANT: CTLTC TR 8002381513
DOCKET NO.: 22-03535.001-R-1
PARCEL NO.: 09-12-400-018

The parties of record before the Property Tax Appeal Board are CTLTC TR 8002381513, the appellant, by attorney Brian P. Liston of the Law Offices of Liston & Tsantilis, P.C. in Chicago, 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: \$258,010
IMPR.: \$171,930
TOTAL: \$429,940

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 2022 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 is improved with a two-story dwelling of frame construction containing 4,085 square feet of living area. The dwelling was built in 1914. Features of the home include an unfinished basement, central air conditioning, two fireplaces, 4½ bathrooms, and a detached garage with 1,020 square feet of building area. The property has a 22,200 square foot site located in Hinsdale, 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 in August 2019 for a price of \$1,250,000. The appellant completed Section IV – Recent Sale Data of the petition identifying the seller and indicating the parties to the transaction were not related. The appellant also disclosed the property was sold through a realtor, was listed in the multiple listing service, and had been advertised for sale since 2017. To further document the sale the appellant provided

copies of the sales contract, the settlement statement dated September 6, 2019, and the PTAX-203 Illinois Real Estate Transfer Declaration disclosing the purchase price of \$1,250,000. Based on this evidence, the appellant requested the subject's total assessment be reduced to \$416,625 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 \$429,940. The subject's assessment reflects a market value of \$1,289,949 or \$315.78 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In support of its contention of the correct assessment the board of review submitted information on four comparable sales improved with two-story dwellings of frame, brick, or frame and brick exterior construction that range in size from 3,774 to 4,941 square feet of living area. The comparables were built from 1927 to 1957. Each home has a basement, central air conditioning, one or two fireplaces, four or five full bathrooms, one or two half-bathrooms, and a garage ranging in size from 596 to 912 square feet of building area. These properties have sites ranging in size from 15,000 to 22,000 square feet of land area. The comparables are located from approximately .08 to .48 of a mile from the subject property. The board of review submitted a map depicting the location of the comparables in relation to the subject property. The sales occurred from December 2019 to October 2021 for prices ranging from \$1,600,000 to \$2,010,000 or from \$406.80 to \$437.32 per square foot of living area, including land. The board of review further indicated that in 2020 the board of review adjusted the subject's assessment to reflect the purchase price and that assessment had been adjusted by equalization factors.

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 disclosing the subject sold in an arm's length transaction, closing on September 6, 2019, for a price of \$1,250,000. Although the transaction is arm's length, the Board finds the sale occurred approximately 28 months prior to the assessment date at issue, which calls into question whether the sales price would be indicative of fair cash value as of January 1, 2022. The board of review submitted four comparable sales with varying degrees of similarity to the subject. The Board gives less weight to board of review comparables #3 and #4 as these properties sold in December 2019 and July 2020, respectively, not as proximate in time to the assessment date as the best sales in this record. The Board finds board of review comparables #1 and #2 sold most proximate in time to the assessment date in April and October 2021 for prices of \$1,955,000 and \$2,010,000 or for \$431.66 and \$406.80 per square foot of

¹ Property Tax Appeal Board procedural rule section 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Illinois Department of Revenue (IDOR) will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). As of the development of this Final Administrative Decision, the IDOR has not published figures for tax year 2022.

living area, including land, respectively. The subject's assessment reflects a market value of \$1,289,949 or \$315.78 per square foot of living area, including land, which is below the prices of the two best comparable sales in this record. Based on this record, after considering the purchase price of the subject property and the two best sales presented by the board of review, the Board finds the assessment of the subject property as established by the board of review is correct and 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: March 26, 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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