



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

APPELLANT: Placido Villareal
DOCKET NO.: 23-05523.001-R-1
PARCEL NO.: 03-33-201-017

The parties of record before the Property Tax Appeal Board are Placido Villareal, the appellant by attorney Kevin Fanning, of Fanning Law, LLC 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: \$72,410
IMPR.: \$108,620
TOTAL: \$181,030

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 2023 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 six-unit apartment building of masonry exterior construction with 3,816 square feet of building area that was constructed in 1961. Features include a basement, central air conditioning and a 432 square foot garage. The property has a 12,356 square foot site and is located in Addison, Addison Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted information on four comparable sales located from .89 of a mile to 2.03 miles from the subject. The comparables have sites ranging in size from 4,270 to 16,506 square feet of land area that are improved with 2-story or 3-story apartment buildings of masonry exterior construction ranging in size from 3,015 to 7,200 square feet of building area. Each building has either four or six apartments. Two comparables have basements. Three comparables have central air conditioning. The comparables sold from June 2021 to October 2022 for prices

ranging from \$380,000 to \$621,000 or from \$76.67 to \$126.04 per square foot of building area. 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 \$181,030. The subject's assessment reflects a market value of \$544,615 or \$142.72 per square foot of building area, land included, when using the 2023 three year average median level of assessment for DuPage County of 33.24% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on seven comparable sales located from .19 to 2.40 miles from the subject property. The comparables have sites ranging in size from 3,304 to 17,899 square feet of land area that are improved with 2-story or 3-story apartment buildings of masonry exterior construction ranging in size from 3,808 to 5,544 square feet of building area. Each building has six apartments. Three comparables have basements. The comparables sold from February 2021 to February 2023 for prices ranging from \$520,000 to \$720,000 or from \$115.44 to \$177.87 per square foot of building area. 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 record contains eleven comparable sales for the Board's consideration. The Board gives less weight to the appellant's comparables along with board of review comparables #4 through #7 due to differences in building size and/or location as seven of these comparables are from 1.47 to 2.40 miles away from the subject.

The Board finds the best evidence of market value to be board of review comparable sales #1, #2 and #3 which are most similar to the subject in location, building size and have basements. These most similar comparables sold for prices ranging from \$520,000 to \$607,000 or from \$136.27 to \$159.40 per square foot of building area, including land. The subject's assessment reflects a market value of \$544,615 or \$142.72 per square foot of building area, including land, which is within the range established by the best comparable sales in this record. Based on this evidence 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: _____

April 15, 2025



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

Placido Villareal, by attorney:
Kevin Fanning
Fanning Law, LLC
101 N. Wacker Drive
Suite 614
Chicago, IL 60606

COUNTY

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