



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

APPELLANT: Koshy & Omana Oommen
DOCKET NO.: 23-05672.001-R-1
PARCEL NO.: 03-36-130-004

The parties of record before the Property Tax Appeal Board are Koshy & Omana Oommen, the appellants; 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: \$49,360
IMPR.: \$171,690
TOTAL: \$221,050

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 dwelling of frame and brick exterior construction with 3,116 square feet of living area. The dwelling was constructed in 2001 and is approximately 22 years old. Features of the home include an unfinished basement, central air conditioning, one fireplace and a 638 square foot garage. The property has an approximately 7,740 square foot site¹ and is located in Elmhurst, Addison Township, DuPage County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted a copy of Addison Township Residential Property Information sheets for each of the comparable properties, Multiple Listing Service (MLS) sheets for two comparables and a grid analysis with information on three comparable sales located within 0.30 of a mile from the subject property. The comparables have sites with 7,740 or 8,700 square feet of land

¹ The Board finds the best description of the subject's site was found in its property record card which disclosed the site measures 60' x 129' or 7,740 square feet of land area.

area and are reportedly improved with a 2-story or a 3-story² dwelling of brick, brick and frame or stone, brick and frame exterior construction ranging in size from 3,002 to 4,631 square feet of living area. The dwellings range in age from 1 to 11 years old. Each comparable has a basement with one having finished area.³ Each dwelling has central air conditioning, one fireplace and a garage ranging in size from 450 to 675 square feet of building area. The properties sold from July 2020 to October 2022 for prices ranging from \$640,000 to \$807,340 or from \$157.42 to \$220.22 per square foot of living area, land included. Based on this evidence, the appellants requested the subject's total assessment be reduced to \$190,000 which reflects a market value of \$570,057 or \$182.95 per square foot of living area, land included, when applying the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$221,050. The subject's assessment reflects a market value of \$663,216 or \$212.84 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.⁴

In support of its contention of the correct assessment the board of review submitted property record cards for the subject and both parties comparables, a map depicting the proximity of subject to both parties' comparables and a grid analysis with information on three comparable sales located within 0.18 of a mile from the subject property. The comparables have sites ranging in size from 7,740 to 7,860 square feet of land area⁵ and are improved with 2-story dwellings of frame or brick and frame exterior construction ranging in size from 2,852 to 3,726 square feet of living area. The homes were built from 1996 to 2010. Each comparable is reported to have a basement, with one having finished area. Each dwelling has central air conditioning, one or two fireplaces and a garage ranging in size from 400 to 632 square feet of building area. The properties sold from July 2021 to August 2023 for prices ranging from \$637,000 to \$870,000 or from \$223.35 to \$233.49 per square foot of living area, land included.

The property record cards for the appellants' comparable properties report the appellants' comparables #2 and #3 each have finished basement area and the sketch for comparable #1 disclosed the dwelling is 3-story in design, which was not refuted by the appellants in rebuttal.

The board of review also submitted notes on each of the appellants' comparables concluding the appellants' market value per square foot, based on its assessment, falls within the range of sale price per square foot of the appellants' comparables and below the range of the board of review's comparables. Based on this evidence, the board of review requested the subject's assessment be confirmed.

² The MLS sheet for appellant comparable #1 reports this property has a 3-story design.

³ The MLS sheet for appellant comparable #3 reports a 23'x 42' finished basement recreation room.

⁴ Procedural rule Sec. 1910.50(c)(1) provides that in all counties other than Cook, the three-year county wide assessment level as certified by the Department of Revenue will be considered. 86 Ill.Admin.Code Sec. 1910.50(c)(1). Prior to the drafting of this decision, the Department of Revenue has yet to publish figures for tax year 2023.

⁵ The Board finds the best description of site size for the board of review's comparables was found in their respective property record cards, submitted by the board of review, which includes site measurements.

In written rebuttal, the appellants contended three of the board of review's four comparable sales have had "extensive additions done after last purchase or construction." In support of this contention the appellants submitted a copy of the Addison Township Residential Property Information sheets for each of the board of review's properties and the MLS sheets for board of review comparables #1 and #3. The MLS sheets for board of review comparable #3 depicts the property has finished basement area. With respect to board of review comparable #2, the appellants asserted they have been inside this home and it too has a finished basement. The Addison Township Residential Property Information sheets for board of review comparables #2 and #3 report these properties both have an unfinished basement. The appellants also argued the board of review comparable #2 sold in August 2023, after the January 1, 2023 lien date and therefore is not valid for this 2023 appeal.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted six comparable sales for the Board's consideration. The Board finds the parties' comparables are similar to the subject in location but present varying degrees of similarity to the subject in age, design, dwelling size and features. Furthermore, three of the comparables sold either 17 or 29 months prior to the January 1, 2023 assessment date and, therefore, may be less reflective of market value than properties which sold closer to the lien date at issue. Nevertheless, the Board gives less weight to each of the appellants' comparables along with board of review comparable #1 which are less similar to the subject in design, dwelling size, age and/or sold in 2020 or 2021.

The Board finds the best evidence of market value to be board of review comparables #2 and #3 which sold most proximate to the January 1, 2023 assessment date and are generally similar to the subject in location, age, design and some features. However, these two comparables have somewhat larger dwelling sizes and basement finished area in contrast to the subject, suggesting downward adjustments are needed to make these properties more equivalent to the subject. These two comparables sold in April 2022 and August 2023 for prices of \$850,000 and \$870,000 or \$231.61 and \$233.49 per square foot of living area, including land. The subject's assessment reflects a market value of \$663,216 or \$212.84 per square foot of living area, including land, which falls below the two best comparable sales in this record. Given the subject's dwelling size and unfinished basement, relative to the two best comparables, a lower overall market value appears logical. Therefore, after considering appropriate adjustments to the two best comparables for differences from the subject, the Board finds the subject's assessment is justified and a reduction in the subject's assessment is not 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: _____

February 18, 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

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