



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

APPELLANT: Koushik Baddam
DOCKET NO.: 24-00502.001-R-1
PARCEL NO.: 07-01-27-401-028-0000

The parties of record before the Property Tax Appeal Board are Koushik Baddam, the appellant, by attorney Aron Bornstein, of BMI Bornstein LLC in Chicago; and the Will 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 Will County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$47,865
IMPR.: \$179,351
TOTAL: \$227,216

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Will County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2024 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 parties appeared before the Property Tax Appeal Board on April 15, 2026 for a hearing at the Will County Office Building in Joliet pursuant to prior written notice dated February 19, 2026. Appearing was counsel for the appellant, Aron Bornstein, of BMI Bornstein LLC, and appearing on behalf of the Will County Board of Review was Susan McMillin, Chairperson of the Will County Board of Review, and John Trowbridge, Deputy Supervisor of Assessments, along with the board of review's witnesses, Brandi Pocius, Deputy Wheatland Township Assessor, and Bruce Darata, Wheatland Township Assessor.

The subject property consists of a 2-story dwelling of brick exterior construction with an approximately 3,344 square feet of living area. The dwelling was constructed in 2022 and is approximately 2 years old. Features of the home include a basement, central air conditioning, 2.5 bathrooms, a 2-car garage with 451 square feet of building area, and a front porch. The

property has a 9,537 square foot site and is located in Plainfield, Wheatland Township, Will 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 May 24, 2022 for a price of \$602,164. The appellant completed Section IV of the appeal petition disclosing the parties to the sale were not related, the property sold using a realtor and was advertised for sale through the Multiple Listing Service, and the sale was not due to foreclosure or by contract for deed. In support the sale, the appellant submitted copies of a settlement statement indicating payment of a broker's commission and a Real Estate Transfer Declaration indicating the property was advertised for sale.

The appellant also submitted an appraisal estimating the subject had a market value of \$621,000 as of April 12, 2022. The appraisal was prepared by Jacob Steffens, a certified residential real estate appraiser, for a purchase transaction. The appraiser did not inspect the subject or inspect the exterior of any of the comparables.

Under the sales comparison approach, the appraiser selected five comparables located from 1.50 to 5.17 miles from the subject in Plainfield or Naperville. The appraiser stated comparables more than one mile from the subject were chosen due to a lack of new construction within the subject's neighborhood. The parcels range in size from 8,750 to 15,240 square feet of land area and are improved with 2-story homes ranging in size from 2,875 to 3,376 square feet of living area. The dwellings are reported to be new construction. Each home has a basement, central air conditioning, and a 2-car or a 3-car garage. Four comparables sold from April 2021 to February 2022 for prices ranging from \$568,709 to \$701,426 or from \$189.23 to \$209.19 per square foot of living area, including land. One comparable was listed for sale for \$693,680 or \$223.98 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject in site size, bathroom count, dwelling size, garage size, and other amenities to arrive at adjusted prices from \$620,230 to \$693,480. The appraiser did not adjust the listing for not being a sale. Based on this analysis, the appraiser concluded a value for the subject of \$621,000 under the sales comparison approach.

Under the cost approach, the appraiser estimated a land value of \$29,000, a replacement cost new of the improvements of \$599,016, and a value of the site improvements of \$5,000 for a total value of \$633,016 under the cost approach.

In reconciliation, the appraiser gave most weight to the sales comparison approach to conclude a value of \$621,000 for the subject as of April 12, 2022.

At hearing, the appellant argued the best evidence of the subject's market value is its May 2022 sale. In the alternative, the appellant requested a reduction in the assessment to reflect the appraised value conclusion, which was based on similar new construction homes, four of which are also in Plainfield.

Based on this evidence, the appellant requested a reduction in the subject's assessment to reflect the purchase price, or in the alternative, to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$227,216. The subject's assessment reflects a market value of \$681,716 or \$203.86 per square foot of living area, land included, when using the statutory level of assessment of 33.33%. The board of review reported 2023 was the first year of the general assessment cycle and an equalization factor of 1.1320 was applied to non-farm properties in Wheatland Township in 2024.

In support of its contention of the correct assessment, the board of review submitted information on five comparable sales located within the same subdivision as the subject, four of which are on the same street as the subject and one of which is on the same tax block as the subject. The board of review did not report the site sizes of these comparables. The comparables are improved with 2-story homes with 3,344 square feet of living area that were built in 2022 or 2024. Each home has a basement, central air conditioning, 2.5 to 3.5 bathrooms, a 451 or a 532 square foot garage, and a front porch. Three homes each have a fireplace and one home has a patio. The comparables sold from August 2023 to June 2024 for prices ranging from \$634,718 to \$760,008 or from \$189.81 to \$227.28 per square foot of living area, including land.

The board of review submitted a letter from the township assessor's office contending that appraisal sales #1 and #5 are not in Wheatland Township like the subject and the other appraisal sales are not in the subject's neighborhood. It was contended that the subject's assessment was reduced to the purchase price in 2023 and only the equalization factor of 1.1320 was added to the assessment in 2024. With regard to the board of review's comparables, it was asserted they are the same model with the same dwelling size, and basement size as the subject, although they have varying degrees of similarity to the subject in fireplace count and bathroom count.

At hearing, Pocius testified that she selected the comparables, which are 2023 and 2024 sales in the subject's neighborhood with sale prices ranging from \$700,000 to \$760,000.¹ Pocius stated the sales are all new construction homes. Pocius testified the subdivision has 86 homes but she did not have the distances of these sales in relation to the subject. Trowbridge clarified the sales are within blocks of the subject based on their PINs. Pocius testified the comparables' sites are similar to the subject, although she did not have their site sizes, and that land is assessed on a site basis at \$47,865 within the subdivision. When asked by the Administrative Law Judge for clarification on the different land assessments for four comparables, Pocius explained these homes were built in 2024 and sold in 2024 so these properties would not be fully assessed until 2025.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant argued at hearing that the board of review's comparables that sold in 2024 after the assessment date would need downward adjustments for date of sale. The appellant asserted appraisal sale #1 and the board of review's comparable #5 had a similar per square foot price of about \$189 per square foot. Based on \$189 per square foot, the subject would have a market value of \$632,000.

¹ The Board notes comparable #5 sold for a price of \$634,718.

In sur-rebuttal at hearing, the board of review argued all sales must be considered, not only ones that sold for the \$189 per square foot. The board of review contended the board of review's comparables are the same model home as the subject and within the same area as the subject.

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 presented evidence of a May 2022 sale of the subject and an appraisal and the board of review presented five comparable sales in support of their respective positions before the Board. The Board gives less weight to the May 2022 sale of the subject as this sale occurred approximately 19 months prior to the January 1, 2024 assessment date and is less likely to be indicative of market value as of the assessment date. The Board also gives less weight to the appraised value conclusion, which was based primarily on the sales comparison approach. The Board finds the appraisal states a value conclusion as of April 12 2022, approximately 20 months prior to the January 1, 2024 assessment date and relies on comparables located from 1.50 to 5.17 miles from the subject, one of which is a listing and four of which sold in 2021 and 2022. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value as of the assessment date.

The Board finds the best evidence of market value to be the board of review's comparables, which sold proximate in time to the assessment date and are more similar to the subject in location, site size, dwelling size, age, and features. However, these comparables were new construction at the time of sale, whereas the subject property was an approximately 2 year old home as of the assessment date, suggesting downward adjustments to these comparables for age would be needed to make them more equivalent to the subject. Moreover, three comparables have a fireplace unlike the subject, four comparables have one more full bathroom than the subject, one comparable has a larger garage than the subject, and one comparable has a patio unlike the subject, suggesting additional downward adjustments would be needed. Three comparables each lack a half bathroom that is a feature of the subject, suggesting upward adjustments would be needed for this feature. These comparables sold for prices ranging from \$634,718 to \$760,008 or from \$189.81 to \$227.28 per square foot of living area, including land. The subject's assessment reflects a market value of \$681,716 or \$203.86 per square foot of living area, including land, which falls within the range established by these sales. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, such as their newer ages and superior amenities compared to the subject, the Board finds the subject's assessment is reflective of market value 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

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: May 19, 2026



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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