



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

APPELLANT: UI Soon Lee
DOCKET NO.: 24-04213.001-R-1
PARCEL NO.: 03-08-319-030

The parties of record before the Property Tax Appeal Board are UI Soon Lee, the appellant, by attorney Spiro G. Zarkos, of Verros Berkshire, PC, in Oakbrook Terrace, 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: \$57,849
IMPR.: \$204,539
TOTAL: \$262,388

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 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 subject property consists of a two-story dwelling of brick exterior construction with 3,782 square feet of living area. The dwelling was constructed in 2005 and is approximately 19 years old. Features of the home include a basement that is 75% finished, 4½ bathrooms, central air conditioning, a fireplace, and an 814 square foot garage. The property has an approximately 11,325 square foot site and is located in Itasca, Addison Township, DuPage County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument, the appellant submitted information on four comparable sales, two of which are located in the same neighborhood code as the subject. Comparables #3 and #4 are each 2.8-miles from the subject. The comparables consist of two-story dwellings of brick or brick and frame exterior construction. The homes range in age from 5 to 35 years old and range in size from 3,961 to 4,047 square feet of living area. Each comparable has a basement that is either 50%, 75% or

100% finished. Features include 2½ to 4 bathrooms, central air conditioning, a fireplace, and a garage ranging in size from 494 to 818 square feet of building area. The comparables sold from June 2022 to September 2024 for prices ranging from \$690,000 to \$810,000 or from \$174.20 to \$203.01 per square foot of living area, including land.

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 \$262,388. The subject's assessment reflects a market value of \$787,243 or \$207.99 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.¹

In response to the appellant's evidence, the board of review presented a memorandum prepared by the township assessor. Appellant's comparables #3 and #4 are each located in Addison and stated that neighborhood "is considered to be inferior to that of the subject property."

In support of its contention of the correct assessment, the board of review submitted information on seven comparables located in the same neighborhood code as the subject and within .56 of a mile from the subject. Board of review comparables #1 and #2 are the same property with sales in both 2021 and 2022; for purposes of this analysis, only the more recent 2022 sale shall be examined. In addition, this 2022 sale is the same property as appellant's comparable #2. Board of review comparable #4 is the same property as appellant's comparable #1. The parcels range in size from 7,405 to 17,424 square feet of land area and are improved with two-story dwellings of brick or brick and frame exterior construction. Three homes are brand-new construction having been built in 2024 and the remaining four comparables are 1 to 18 years old. The homes range in size from 3,203 to 3,990 square feet of living area. Each comparable has a basement, six of which have either 75% or 100% finished area. Features include 3½, 4 or 5 bathrooms, central air conditioning, and a garage ranging in size from 580 to 818 square feet of building area. Four homes each have a fireplace. The comparables sold from June 2022 to May 2024 for prices ranging from \$777,100 to \$975,000 or from \$201.66 to \$299.25 per square foot of living area, including land.

Based on this evidence and argument, 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

¹ 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 issuance of this decision, the Department of Revenue has yet to publish Table 3 with the figures for tax year 2024.

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 parties submitted a total of eight suggested comparable sales, as the board of review reported one comparable twice and the parties have two common properties/sales, to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to appellant's comparables #3 and #4 along with appellant's comparable #1/board of review comparable #4, which differ in age and/or location when compared to the subject. The Board has given reduced weight to board of review comparables #3, #5, #6 and #7, due to the ages of the dwellings being new construction or 1 year old whereas the subject dwelling is 19 years old. As noted previously, not only because that is a more recent sale of board of review comparable #2, but also because the date of sale in 2021 is least proximate in time to the lien date at issue of January 1, 2024, the Board has given little weight to board of review comparable #2.

The Board finds the best evidence of market value to be appellant's comparable #2/board of review comparable #1, which property is similar to the subject in location, design, age, exterior construction, dwelling size, foundation type, percentage of finished basement, and some other features. Adjustments to this best comparable are necessary for the difference in age, bathroom count, dwelling size, basement size, and garage size when compared to the subject. This most similar comparable sold in June 2022 for \$800,000 or for \$201.66 per square foot of living area, including land. The subject's assessment reflects a market value of \$787,243 or \$207.99 per square foot of living area, including land, which is below the best comparable sale in this record in terms of overall value and above the best sale on a per-square-foot of living area basis, including land, which appears to be justified given the subject's additional full bathroom and larger basement size. Based on this evidence and after considering appropriate adjustments to the best comparable sale in the record for differences from the subject to make the comparable more equivalent to the subject, 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: _____

December 23, 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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