



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

APPELLANT: Mashkoor Choudhry
DOCKET NO.: 24-04265.001-R-1
PARCEL NO.: 09-15-300-047

The parties of record before the Property Tax Appeal Board are Mashkoor Choudhry, the appellant, by attorney David Kieta, of Kieta Law LLC, in Winfield, 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: \$51,279
IMPR.: \$168,903
TOTAL: \$220,182

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 frame exterior construction with 2,594 square feet of living area. The dwelling was constructed in 1999 and is approximately 25 years old. Features of the home include a full unfinished basement, central air conditioning, a fireplace, and a 440 square foot garage. The property has an approximately 9,404 square foot site and is located in Westmont, Downers Grove Township, DuPage County.

The appellant contends assessment inequity as the basis of the appeal concerning the improvement assessment. In support of this argument, the appellant submitted information on six equity comparables located in the same assessment neighborhood code and within .44 of a mile from the subject. The properties are improved with two-story dwellings of frame or frame and brick exterior construction. The homes are 27 to 32 years old and range in size from 2,635 to 2,690 square feet of living area. Each comparable has a full basement, and five comparables

feature central air conditioning. Each comparable has a fireplace and a garage ranging in size from 440 to 480 square feet of building area. The comparables have improvement assessments ranging from \$156,088 to \$171,633 or from \$58.03 to \$64.09 per square foot of living area. Based on this evidence, the appellant requested a reduced improvement assessment of \$161,139 or \$62.12 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$220,182. The subject property has an improvement assessment of \$168,903 or \$65.11 per square foot of living area.

In support of its contention of the correct assessment, the board of review submitted information on six equity comparables located in the same neighborhood code and within .43 of a mile from the subject. The comparables consist of two-story dwellings of frame exterior construction which are 25 to 28 years old. The homes range in size from 2,508 to 2,785 square feet of living area. Features include basements, three of which are 75% finished, central air conditioning, and a garage ranging in size from 455 to 760 square feet of building area. Five homes each have a fireplace. The comparables have improvement assessments ranging from \$165,563 to \$201,580 or from \$65.35 to \$72.38 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). 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 twelve equity comparables to support their respective positions before the Property Tax Appeal Board. The Board has given reduced weight to the appellant's comparables #1 and #5, due to differences in age and/or the lack of central air conditioning, which is a feature of the subject. The Board has given reduced weight to board of review comparables #4, #5 and #6, due to basement finish, as compared to the subject's unfinished basement.

The Board finds the best equity evidence in the record consists of appellant's comparables #2, #3, #4 and #6 along with board of review comparables #1, #2 and #3, which are either 27 or 28 years old, as compared to the subject of 25 years, suggesting adjustments to the best comparables are necessary to make them more equivalent to the slightly newer subject. The homes are similar to the subject in having unfinished basements, central air conditioning, and a garage. Adjustments to the comparables are necessary for differences in dwelling size, basement size, fireplace amenity, and/or garage size when compared to the subject. These comparables have improvement assessments ranging from \$160,516 to \$175,571 or from \$59.67 to \$66.01 per square foot of living area. The subject's improvement assessment of \$168,903 or \$65.11 per

square foot of living area falls within the range established by the best comparables in this record both in terms of overall improvement assessment and on a per-square-foot of living area basis, despite that the subject is slightly newer than each of these best comparables in the record.

The constitutional provision for uniformity of taxation and valuation does not require mathematical equality. The requirement is satisfied if the intent is evident to adjust the taxation burden with a reasonable degree of uniformity and if such is the effect of the statute enacted by the General Assembly establishing the method of assessing real property in its general operation. A practical uniformity, rather than an absolute one, is the test. Apex Motor Fuel Co. v. Barrett, 20 Ill. 2d 395 (1960). Although the comparables presented by the parties disclosed that properties located in the same area are not assessed at identical levels, all that the constitution requires is a practical uniformity which appears to exist on the basis of the evidence.

Based on this record and after considering appropriate adjustments to the best comparables for differences when compared to the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed 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: _____

January 20, 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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