



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

APPELLANT: Chicago Title Land Trust #8002387920
DOCKET NO.: 24-04483.001-R-1
PARCEL NO.: 07-10-409-017

The parties of record before the Property Tax Appeal Board are Chicago Title Land Trust #8002387920, the appellant, by attorney Joanne Elliott, of Elliott & Associates Attorneys, PLLC in Des Plaines; 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: \$56,124
IMPR.: \$490,090
TOTAL: \$546,214

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 2-story dwelling of frame and masonry exterior construction with 6,595 square feet of living area. The dwelling was constructed in 2023 and is approximately one year old. Features of the home include a basement with finished area, central air conditioning, a two-sided fireplace and a 1,107 square foot 3-car garage. The property has an approximately 17,535 square foot site and is located in Naperville, Naperville Township, DuPage County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$1,500,000 as of January 1, 2024. The appraisal was prepared by Cynthia McDonald, an Associate Real Estate Trainee Appraiser and supervising appraiser DaShawn Weaver-Drew, Certified Residential Real Estate Appraiser. The intended use of the appraisal report was to

determine an opinion of market value for the subject for an ad valorem tax appeal. On page 7 of the appraisal report, the appraisers stated the subject property was “constructed in a neighborhood with houses that are typically 35-50 years old and are in the \$500,000 - \$700,000 range, which gives it inferior location appeal in relation to other newer construction houses with more than 3,500 square feet above-grade.”

In estimating the market value of the subject property, the appraisers developed the sales comparison approach to value selecting four comparable sales located from 0.78 of a mile to 1.88 miles from the subject property. The comparables have sites that range in size from 8,261 to 12,147 square feet of land area and are improved with traditional style dwellings of good quality construction ranging from 3,786 to 6,482 square feet of living area. The homes are 9 to 18 years old. Each comparable has a basement, with three having finished area. Each dwelling has central air conditioning, from one to three fireplaces and a 2-car or a 3-car garage. Comparables #1 and #4 are described as being rehabilitated in 2016 and 2019, respectively. Each of the comparables is further depicted to have locations on a golf course, adjacent to a park or in the downtown area of Naperville. The comparables sold from May 2022 to May 2023 for prices ranging from \$1,319,000 to \$1,600,000 or from \$246.84 to \$348.39 per square foot of living area, land included.

The appraisers adjusted the comparables for differences with the subject in location, dwelling size, room count, finished basement area and other features arriving at adjusted sale prices of the comparables ranging from \$1,415,450 to \$1,543,650 and an opinion of market value for the subject of \$1,500,000.

On page 8 of the report, the appraisers state that the cost approach is most reliable when the improvements are new and do not suffer from excessive physical deterioration, functional obsolescence or external obsolescence. However, the appraisers did not develop the cost approach to value for the subject property which is reported to be new construction.

Based on this evidence, the appellant requested the subject’s assessment be reduced to reflect the appraised value when applying the statutory assessment level of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$546,214. The subject's assessment reflects a market value of \$1,638,806 or \$248.49 per square foot of living area, land included, when using the statutory level of assessment of 33.33%.

In support of its contention of the correct assessment the board of review submitted information on six comparables, five of which are located within from 1.04 to 2.06 miles from the subject property. Board of review comparable #1 is the same property as appraisal sale #3. The comparables have sites that range in size from 10,164¹ to 32,656 square feet of land area and are improved with 2-story or 2½-story dwellings of frame, brick, or frame and brick exterior construction ranging from 5,578 to 7,319 square feet of living area. The homes were built from 2006 to 2013. Each comparable has a basement with finished area, central air conditioning, from

¹ The Board finds board of review comparable #3 has a site size measuring 77’x 132’ or 10,164 square feet of land area as depicted in the Comparable Report submitted by the board of review.

one to four fireplaces and a garage ranging in size from 663 to 1,513 square feet of building area. Comparables #4, #5 and #6 each have an inground swimming pool amenity. The comparables sold from July 2021 to November 2023 for prices ranging from \$1,600,000 to \$2,400,000 or from \$246.84 to \$363.03 per square foot of living area, land included.

The board of review also submitted a Comparable Report which included comments asserting the subject property is an over improvement, requiring comparables from outside of the subject's neighborhood. The board of review also contended the "homeowners paid \$697,000 for the land and the original house, which was torn down. The new house was then constructed with permits totalling (sic) \$917,000." Based on this evidence, the board of review requested the subject's assessment be confirmed.

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 submitted an appraisal and board of review submitted six comparable sales for the Board's consideration, one of which was also selected by the appraisers.

The Board finds three of the appraisal comparables are from approximately 28% to 43% smaller in dwelling size, when compared to the subject, when more similarly sized comparable sales were available but not selected as demonstrated by the comparable sales submitted by the board of review. Furthermore, the Board finds it problematic that no cost approach to value was developed by the appraiser, despite the subject property being one year old construction and the appraisers' statement that "the cost approach is most reliable when the improvements are new." As a result, the Board finds the appraisers' opinion of value to be less credible or reliable and gives the appraised value of the subject property little weight. The Board shall instead consider the raw sales presented in the appellant's appraisal.

The Board gives reduced weight to appraisal comparables #1, #2 and #4 which are from 28% to 43% smaller in dwelling size than the subject property. The Board gives less weight to board of review comparables #4, #5 and #6 which have an inground swimming pool amenity, unlike the subject.

The Board finds the best evidence of market value to be appraisal comparable #3/board of review comparable #1 and board of review comparables #2 and #3 which are overall more similar to the subject in dwelling size, site size and other features. These best comparables sold from April 2022 to November 2023 for prices ranging from \$1,600,000 to \$2,295,000 or from \$246.84 to \$362.04 per square foot of living area, including land. The subject's assessment reflects a market value of \$1,638,806 or \$248.49 per square foot of living area, including land, which falls within the range established by the best comparable sales in the record. After

considering adjustments to the comparables for differences from 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

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: June 16, 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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