



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

APPELLANT: Jingan (Linda) Wang  
DOCKET NO.: 09-04211.001-R-1  
PARCEL NO.: 08-21-216-002

The parties of record before the Property Tax Appeal Board are Jingan (Linda) Wang, the appellant; and the DuPage County Board of Review.

Based on the facts and exhibits presented, the Property Tax Appeal Board hereby finds a reduction 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:** \$30,330  
**IMPR.:** \$52,340  
**TOTAL:** \$82,670

Subject only to the State multiplier as applicable.

**ANALYSIS**

The subject property is improved with a split-level dwelling built in 1979. The dwelling is frame construction and contains 1,120 square feet of living area. Features of the home include a partial basement with finished area, central air conditioning, a fireplace and a 2-car garage containing 412 square feet. The dwelling is located in Lisle, Lisle Township, DuPage County.

The appellant contends that the market value of the subject property is not accurately reflected in the property's assessed valuation based on an appraisal, comparable sales and a recent sale. The appellant submitted a Freddie Mac Broker's Price Opinion prepared by Nick Lambros in which a market value ranging from \$244,000 to \$248,000 was estimated for the subject property, depending on the days of marketing time, as of May 28, 2009.

In addition to the Broker's Price Opinion, the appellant submitted a grid analysis of four comparable properties that sold from 1991 to 2000. They are described as split-level or bi-level dwellings containing ranging in size from 1,082 to 1,860 square feet of living area. The appellant also submitted three spreadsheets of home sales, split-structure sales and bi-level/ranch sales in the subject's neighborhood over the past ten years from 1998 to 2009.

The appellant also contends overvaluation based on the recent sale of the subject property, but did not complete Section IV of the appeal form and indicated in Section III of the form that the last sale of the subject occurred in 1998.

Based on this record, the appellant requested the subject's assessment be reduced to \$82,330 which would reflect a market value of approximately \$247,000 at the statutory level of assessment of 33.33%.

The board of review submitted its "Board of Review Notes on Appeal" wherein the subject's final assessment of \$95,700 was disclosed. The subject's assessment reflects an estimated market value of \$287,733 or \$256.90 per square foot of living area, land included, using the 2009 three-year median level of assessments for DuPage County of 33.26% as determined by the Illinois Department of Revenue. (86 Ill.Admin.Code Sec. 1910.50(c)(1)).

The board of review submitted information on three comparable sales described as split-level or bi-level frame dwellings built between 1977 and 1980. These comparables range in size from 988 to 1,122 square feet of living area. The comparables feature full or partial basements with finished area, central air conditioning, 1 or 2 fireplaces and garages that contain between 399 and 412 square feet. These comparables sold from June 2006 to April 2007 for prices ranging from \$283,500 to \$312,000 or from \$272.54 to \$288.35 per square foot of living area including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

After reviewing the record and considering the evidence, the Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of this appeal. The Property Tax Appeal Board further finds the evidence in the record supports a reduction in the subject's assessment.

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 must be proven by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3<sup>rd</sup> Dist. 2002). Proof of market value may consist of an appraisal of the subject property, a recent sale of the subject property or comparable sales. (86 Ill.Admin.Code Sec. 1910.65(c)). After an analysis of the evidence in the record, the Board finds a reduction in the subject's assessment is warranted.

The appellant claims Recent Sale as a basis for the appeal, but the Board finds the appellant did not complete Section IV - Recent Sale Data of the appeal form and indicated in Section III of the form that the most recent sale of the subject was in 1998. Therefore this argument received no weight in the Board's analysis.

The appellant also submitted four comparable properties that were similar to the subject in exterior construction, style and age. However, these comparables sold from 1991 to 2000. The Board finds these sales are dated and not reliable or credible indicators of the subject's fair market value as of its assessment date of January 1, 2009.

The Board finds the best evidence of market value in the record is the Broker's Price Opinion which values the subject property between \$244,000 and \$248,000. This value range is supported by the spreadsheet submitted by the appellant. The subject's assessment reflects a market value above this range. Based on this record the Board finds a reduction in the subject's assessment is appropriate.

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.

*Ronald R. Cuit*

Chairman

*K. L. Fern*

Member

*Frank A. Huff*

Member

*Mario Morris*

Member

*J. R.*

Member

DISSENTING: \_\_\_\_\_

C E R T I F I C A T I O N

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: July 20, 2012

*Allen Castrovillari*

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 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 the subsequent year 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.

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.