



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

APPELLANT: Michael Suerth
DOCKET NO.: 10-01815.001-R-1
PARCEL NO.: 02-27-324-013

The parties of record before the Property Tax Appeal Board are Michael Suerth, 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: \$21,270
IMPR.: \$35,310
TOTAL: \$56,580

Subject only to the State multiplier as applicable.

ANALYSIS

The subject property is improved with a split level single family dwelling with 1,092 square feet of living area. The dwelling was constructed in 1963 and is of brick and frame construction. Features of the home include a partial basement, central air conditioning and a one-car garage. The subject property has 6,480 square feet of land area and is located in Glendale Heights, Bloomingdale Township, DuPage County.

The appellant contends overvaluation with respect to the assessment of the property for the 2010 tax year as the basis of the appeal. In support of this argument the appellant submitted three appraisals. Each appraisal was prepared by real estate appraiser Nathan Grant of Cornerstone Appraisal. Grant is a State of Illinois Certified Residential Real Estate Appraiser. The appraisals had the following estimates of value:

Effective Date	Cost Approach	Sales Approach	Conclusion
10/31/2009	\$179,900	\$170,000	\$170,000
06/21/2010	N/A	\$170,000	\$170,000
01/11/2011	N/A	\$160,000	\$160,000

In the first appraisal the appraiser used three comparable sales and two listings improved with three split-level dwellings and

two ranch style dwellings that ranged in size from 999 to 1,086 square feet of living area. The dwellings ranged in age from 37 to 44 years old. Four comparables had a full or partial basement that were finished, each comparable had central air conditioning, one comparable had a fireplace and each had a one car garage. Each property was located in Glendale Heights. The sales occurred from June to August 2009 for prices ranging from \$142,000 to \$177,500 or from \$130.76 to \$190.00 per square foot of living area, including land. The listings had prices of \$209,900 and \$204,900 or for \$204.38 and \$199.51 per square foot of living area, including land, respectively. The appraiser adjusted the comparables for differences from the subject and arrived at adjusted prices ranging from \$158,500 to \$185,106.

In the second appraisal the appraiser used four comparable sales, one pending sale and one listing improved with three raised ranch style dwellings, two split-level dwellings and one ranch style dwelling that ranged in size from 1,019 to 1,252 square feet of living area. The dwellings ranged in age from 37 to 48 years old. Five comparables had a partial basement that were finished, each comparable had central air conditioning, two comparables had a fireplace and each had a one-car or two-car garage. Each property was located in Glendale Heights. The sales occurred from January to June 2010 for prices ranging from \$162,000 to \$190,000 or from \$149.17 to \$181.55 per square foot of living area, including land. The pending sale and listing had prices of \$199,900 and \$189,900 or for \$195.98 and \$186.18 per square foot of living area, including land, respectively. The appraiser adjusted the comparables for differences from the subject and arrived at adjusted prices ranging from \$167,000 to \$181,703.

In the third appraisal the appraiser used three comparable sales improved with split-level style dwellings that had either 1,056 or 1,187 square feet of living area. The dwellings were 37 or 48 years old. Each comparable had a partial basement that was finished, each comparable had central air conditioning and two comparables had a one-car. Each property was located in Glendale Heights. The sales occurred from July to October 2010 for prices ranging from \$152,500 to \$172,500 or from \$139.01 to \$145.32 per square foot of living area, including land. The appraiser adjusted the comparables for differences from the subject and arrived at adjusted prices ranging from \$157,550 to \$168,500.

Based on this evidence the appellant requested the subject's assessment be reduced to \$53,333 to reflect a market value of approximately \$160,000.

The board of review submitted its "Board of Review Notes on Appeal" wherein its final assessment for the subject of \$65,120 was disclosed. The subject's assessment reflects a market value of \$195,673 or \$179.19 per square foot of living area, including land, when applying the 2010 three year average median level of assessments for DuPage County of 33.28%.

In support of the assessment the board of review submitted an Addendum to Board of Review Notes on Appeal, a copy of a letter from the Bloomingdale Township Assessor's office and two grids containing comparables identified by the assessor and the appellant's comparable sales. The assessor's comparables #1 through #5 were equity comparables. Assessor comparables #6 through #10 were comparables sales improved with split level dwellings of brick and frame construction that ranged in size from 1,020 to 1,076 square feet of living area. The comparables were constructed in 1962 and 1963. Each comparable had a basement that was partially finished, central air conditioning and a two-car attached or detached garage. The sales occurred from March 2007 to August 2009 for prices ranging from \$195,000 to \$257,000 or from \$183.96 to \$243.37 per square foot of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

The appellant submitted a statement in rebuttal commenting on the board of review's submission.

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 the appeal. The 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 of the property must be proved by a preponderance of the evidence. National City Bank of Michigan/Illinois v. Illinois Property Tax Appeal Board, 331 Ill.App.3d 1038 (3rd Dist. 2002). 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 met this burden of proof and a reduction in the subject's assessment is warranted.

The Board finds the best evidence in this record establishing the subject's market value as of January 1, 2010 include appellant's appraisals with the effective dates of October 31, 2009 and June 21, 2010. Both appraisals had estimates of value of \$170,000, which is below the market value reflected by the subject's assessment. In these reports the appraiser used sales and listings that occurred in 2009 and 2010. The appraiser also made adjustments to the comparables to account for differences from the subject property. The Board gave less weight to the appellant's third appraisal due to the fact the effective date was January 11, 2011, one year after the assessment date at issue. The board of review submitted information on five unadjusted comparable sales with only one occurring in 2009, four sales occurred from March 2007 to October 2008. Less weight was given to this evidence due primarily to the sale dates and due to the fact the sales were unadjusted. Considering the effective dates of each appraisal, the sales utilized in each report and the fact the appraiser adjusted the sales for differences from

the subject property, the Board finds the subject property had a market value of \$170,000 as of January 1, 2010. Since market value has been established the 2010 three year average median level of assessments for DuPage County of 33.28% shall apply.

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.

Donald 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: April 19, 2013

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.