



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

APPELLANT: Ravi Seeralan
DOCKET NO.: 13-02147.001-R-1
PARCEL NO.: 15-21-403-025

The parties of record before the Property Tax Appeal Board are Ravi Seeralan, the appellant, by attorney Edward C. Abderholden, of Abderholden Law Offices, PC in Chicago; and the Lake 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 Lake County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$ 30,866
IMPR.: \$159,801
TOTAL: \$190,667

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Lake County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2013 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 brick dwelling that has 3,778 square feet of living area. The dwelling was constructed in 2004. The dwelling features an unfinished basement, central air conditioning, two fireplaces and a 668 square foot attached garage. The subject property has a 12,814 square foot site. The subject property is located in Vernon Township, Lake County, Illinois.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In

support of this argument, the appellant submitted six comparable sales located from .17 to .52 of a mile from the subject. The comparables consist of two-story frame dwellings that were built from 1996 to 1998 and contain from 3,001 to 3,877 square feet of living area. Features had varying degrees of similarity when compared to the subject. The comparables sold from June 2011 to May 2013 for prices ranging from \$460,000 to \$592,000 or from \$151.48 to \$161.10 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 \$196,153. The subject's assessment reflects an estimated market value of \$590,111 or \$156.20 per square foot of living area including land when applying the 2013 three-year average median level of assessment for Lake County of 33.24%. In support of the subject's assessment, the board of review submitted an analysis of four comparable sales and a letter addressing the appeal. Two comparables were also used by the appellant.

The comparable sales are located from .37 to .64 of a mile from the subject. The comparables consist of two-story frame dwellings that were built in 1996 or 1997 and contain from 3,414 to 3,776 square feet of living area. Features had varying degrees of similarity when compared to the subject. The comparables sold from August 2012 to July 2013 for prices ranging from \$568,000 to \$645,000 or from \$151.48 to \$183.71 per square foot of living area including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Under rebuttal, the appellant's counsel noted the subject's land assessment is inferior (less) than all the comparables due to the fact the subject is adjacent to a busy thoroughfare, North Prairie Road, and is not really located in Mirielle subdivision, but is situated on an out lot. The appellant submitted a map to support these claims.

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 met this burden of proof.

The parties submitted eight comparable sales for the Board's consideration. All the comparables are slightly older in age than the subject, but six of the eight comparables have finished basements, superior to the subject. The Board gave less weight to comparables #2, #3 and #5 submitted by the appellant. These

properties sold in 2011, which are dated and less indicative of market value as of the subject's January 1, 2013 assessment date. The Board also gave less weight to comparable #3 submitted by the board of review for several reasons. This property is located furthest from the subject and across from railroad tracks that bifurcates the subject's subdivision, which is effectively in a different market neighborhood. This finding is bolstered by the fact that this comparable sold for significantly more than any other comparable property in this record. Finally, the comparable #3 is located across the street from a park, whereas the subject is adjacent to a busy thoroughfare, North Prairie Road. The Board finds the remaining four comparables, which were most similar when compared to the subject in location, land area, design, dwelling size, age and features, sold for prices ranging from \$550,000 to \$585,000 or from \$151.48 to \$166.37 per square foot of living area including land. The subject's assessment reflects an estimated market value of \$590,111 or \$156.20 per square foot of living area including land. The subject's estimated market value is greater than all four of the most similar comparables on an overall basis. The two common comparables submitted by the parties sold for prices of \$151.48 and \$155.71 per square foot of living area including land, respectively, less than the subject's estimated market value of \$156.20 per square foot of living area including land. After considering adjustments to the most similar comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is 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.

Mario Albino

Chairman

K. L. Ferr

Member

JR

Member

Jerry White

Acting Member

Robert Hoffmann

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 22, 2016

A. Heston

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.