



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

APPELLANT: Timothy Coffee & Cristina Cortesi-Coffee
DOCKET NO.: 15-01637.001-R-1
PARCEL NO.: 15-12-404-010

The parties of record before the Property Tax Appeal Board are Timothy Coffee & Cristina Cortesi-Coffee, the appellants; and the Lake 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 **Lake** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$93,671
IMPR.: \$142,255
TOTAL: \$235,926

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants 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 2015 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 construction with 3,344 square feet of living area. The dwelling was constructed in 1970. Features of the home include a full basement that is partially finished, central air conditioning, a fireplace and a 460 square foot garage. The property has a 36,590 square foot site and is located in Lake Forest, Vernon Township, Lake County.

The appellants contend overvaluation as the basis of the appeal. In support of this argument the appellants submitted an appraisal estimating the subject property had a market value of \$660,000 as of January 12, 2016. The appellants' appraiser selected four comparable sales and one listing that were located from .35 of a mile to 1.80 miles from the subject property.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$235,926. The subject's assessment reflects a market value of

\$711,049 or \$212.63 per square foot of living area, land included, when using the 2015 three year average median level of assessment for Lake County of 33.18% as determined by the Illinois Department of Revenue.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales that were located within a few blocks of the subject in the same immediate subdivision. The comparables were located from .15 to .25 of a mile from the subject property.

The board of review submitted a brief that revealed none of the sales utilized in the appellants' appraisal were located in the same subdivision as the subject. The board of review's evidence included a grid of the appellants' appraisal comparables, which included notes for each comparable. A copy of the Multiple Listing Service (MLS) sheet for appellants' appraisal comparable #1 was included, which disclosed the property was marketed as "Unique opportunity to renovate...Also opportunity for a tear down".

Under rebuttal, the appellants submitted a second appraisal estimating the subject property had a market value of \$670,000 as of July 16, 2015.

Pursuant to the rules of the Property Tax Appeal Board, rebuttal evidence is restricted to that evidence to explain, repel, counteract or disprove facts given in evidence by an adverse party. (86 Ill. Admin. Code, Sec. 1910.66(a)). Moreover, rebuttal evidence shall not consist of new evidence such as an **appraisal** or newly discovered comparable properties. (86 Ill. Admin. Code, Sec. 1910.66(c)). In light of these rules, the Property Tax Appeal Board has not considered the appraisal submitted by appellants in conjunction with their rebuttal argument.

Conclusion of Law

The appellants contend 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 appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The Board finds the best evidence of market value to be the board of review's comparable sales. These comparables were located more proximate to the subject property, than the comparables selected by the appellants' appraiser. These comparables had varying degrees of similarity when compared to the subject and also sold proximate in time to the January 1, 2015 assessment date at issue. The board of review's comparable sales sold for prices ranging from \$665,000 to \$910,000 or from \$241.47 to \$256.83 per square foot of living area, including land. The subject's assessment reflects a market value of \$711,049 or \$212.63 per square foot of living area, including land, which is supported by the market values of the best comparable sales in the record. The Board gave less weight to the appellants' appraisal value conclusion due to its effective date occurring greater than 12 months after the assessment date at issue. Based on this evidence 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.



Chairman



Member



Member



Acting 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: _____

April 21, 2017



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.