



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

APPELLANT: Richard Singapori  
DOCKET NO.: 15-02050.001-R-1  
PARCEL NO.: 11-02-401-064

The parties of record before the Property Tax Appeal Board are Richard Singapori, the appellant, by attorney Joanne Elliott of Elliott & Associates, P.C., in Des Plaines; 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:** \$ 50,168  
**IMPR.:** \$129,202  
**TOTAL:** \$179,370

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 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 wood siding exterior construction that has 2,842 square feet of living area. The dwelling was constructed in 1998. The home features a finished basement, central air conditioning, a fireplace and a 460 square foot attached garage. The subject has an 25,042 square foot site. The subject property is located in Libertyville Township, Lake County, Illinois.

The appellant submitted evidence before the Property Tax Appeal Board claiming both overvaluation and unequal treatment in the assessment process as the bases of the appeal. In support of these arguments, the appellant submitted information pertaining to the subject's sale, three comparable sales and three assessment comparables. The subject's land assessment was not contested.

In support of the overvaluation argument, the appellant completed Section IV of the residential appeal petition. The appeal petition depicts the subject property sold for \$475,000 in March 2013. The seller was reported to be U.S. Bank National Association; the sale did not involve family or related parties; and the property was advertised through the Multiple Listing Service for 40 days. The sale was a result of foreclosure.

In further support of the overvaluation contention, the appellant submitted three comparable sales. The comparables are located within .37 of a mile from the subject, but in a different assessment neighborhood and subdivision than the subject. The comparables had varying degrees of similarity when compared to the subject. The comparables sold from January 2014 to October 2014 for prices ranging from \$470,000 to \$501,500 or from \$144.88 to \$165.02 per square foot of living area including land.

To demonstrate the subject dwelling was not uniformly assessed, the appellant submitted three equity comparables. The comparables are located within .33 of a mile from the subject, but in a different assessment neighborhood and subdivision than the subject. The comparables had varying degrees of similarity when compared to the subject. The comparables have improvement assessments ranging from \$105,131 to \$116,053 or from \$36.16 to \$38.19 per square foot of living area.

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 \$179,370. The subject's assessment reflects an estimated market value of \$540,597 or \$190.22 per square foot of living area including land area when applying Lake County's 2015 three-year average median level of assessment of 33.18%. The subject property has an improvement assessment of \$129,202 or \$45.46 per square foot of living area. In support of the subject's assessment, the board of review submitted four comparable sales and four assessment comparables.

The comparable sales are located within .56 of a mile from the subject and are located in the same assessment neighborhood and subdivision as the subject. The comparables had varying degrees of similarity when compared to the subject. The comparables sold from January 2014 to March 2016 for prices ranging from \$550,000 to \$660,000 or from \$175.24 to \$203.26 per square foot of living area including land.

The four assessment equity comparables are located within .35 of a mile from the subject and are located in the same assessment neighborhood and subdivision as the subject. The comparables had varying degrees of similarity when compared to the subject. The comparables have improvement assessments ranging from \$130,906 to \$143,015 or from \$44.70 to \$47.86 per square foot of living area.

With respect to the appellant's evidence, the board of review argued the comparables are not located in the "Reigate Woods" development as the subject and they have differences in basement area or lack of finished basement area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Under rebuttal, the appellant's counsel critiqued the comparables submitted by the board of review noting differences in land area, exterior construction, number of bathrooms, dwelling size and garage area.

### Conclusion of Law

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation as a basis of the appeal. 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.

The Board gave less weight to the subject's June 2013 sale price. The subject's sale is dated and less indicative of market value as of the January 1, 2015 assessment date. Additionally, the subject's sale was a result of foreclosure, which calls into question the arm's-length nature of the transaction.

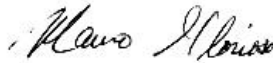
The parties submitted seven comparable sales for the Board's consideration. The Board gave less weight to comparable sales submitted by the appellant due to their location in a different assessment neighborhood and subdivision than the subject. Moreover, these properties have sites that are considerably smaller than the subject. The gave less weight to comparables #1 and #4 submitted by the board of review. Comparable #1 is larger in dwelling size when compared to the subject. Comparable #4 sold in March 2016, 15 months subsequent to the subject's January 1, 2015 assessment date. The Board finds the remaining two comparable sales submitted by the board of review are most similar when compared to the subject in location, land area, design, age, dwelling size and features. These comparables sold in January 2014 and August 2015 for prices of \$654,500 and \$660,000 or \$202.45 and \$203.26 per square foot of living area including land, respectively. The subject's assessment reflects an estimated market value of \$540,597 or \$190.22 per square foot of living area including land, which is considerably less than the most similar comparable sales contained in the record. After considering any necessary adjustments to the comparables for differences when compared to the subject, the Board finds the subject's estimated market value as reflected by its assessment is supported. Therefore, no reduction in the subject's assessment is warranted based on overvaluation.

The taxpayer also argued assessment inequity as an alternative basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof.

The parties submitted seven assessment comparables for the Board's consideration. The Board gave less weight to comparables submitted by the appellant due to their location in a different assessment neighborhood and subdivision than the subject. The Board finds the assessment

comparables submitted by the board of review were similar when compared to the subject in location, design, age, dwelling size and most features. They have improvement assessments ranging from \$130,906 to \$143,015 or from \$44.70 to \$47.86 per square foot of living area. The subject property has an improvement assessment of \$129,202 or \$45.46 per square foot of living area, which falls within the range established by the similar assessment comparables contained in this record on a per square foot basis. Therefore, no reduction in the subject's improvement assessment is warranted based on assessment equity.

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



Acting Member



Member



Acting 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 23, 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.