



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

APPELLANT: Joanna Sokolowski
DOCKET NO.: 15-02141.001-R-1
PARCEL NO.: 15-19-101-004

The parties of record before the Property Tax Appeal Board are Joanna Sokolowski, the appellant, by attorney Scott Shudnow, of Shudnow & Shudnow, Ltd. in Chicago; 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: \$56,547
IMPR.: \$221,489
TOTAL: \$278,036

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 2-story dwelling of brick exterior construction built in 2005. The dwelling contains 5,045 square feet of living area.¹ Features of the home include a full finished basement, central air conditioning, 3 fireplaces and an 843 square foot garage. The subject's site is approximately 2.8 acres in size. The subject property is located in Long Grove, Vernon Township, Lake County.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$740,000

¹ The appraiser claims the subject contains 4,965 square feet of living area and submitted a schematic drawing to support the claim. The assessor claims the subject contains 5,045 square feet of living area and submitted a property record card with schematic to support the claim. Given that assessors measure from the outside walls, the assessor's slightly larger size is justified.

or \$146.68 per square foot of living area as of January 1, 2015. The appraiser analyzed five comparables that sold from February 2013 through October 2014 for prices ranging from \$650,000 to \$905,000. After adjusting for various differences with the subject location, site size, dwelling size and numerous other characteristics, the comparables adjusted sale prices ranged from \$669,000 to \$837,000 or from \$135.07 to \$191.34 per square foot of living area. Based on this evidence, the appellant requested the subject's assessment be reduced to \$246,667.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject property of \$278,036. The subject's January 1, 2015 assessment reflects an estimated market value of \$837,963 or \$166.10 per square foot of living area including land when applying 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 the subject's assessment, the board of review submitted four comparables, three of which had sold and one of which was an active listing located adjacent to the subject. These four comparables are described as 2-story dwellings of frame, brick or Dryvit[®] exterior construction built between 1991 and 2001 and ranging in size from 4,718 to 7,163 square feet of living area. They feature full or partial finished basements, central air conditioning, 2-5 fireplaces and garages that range in size from 792 to 1,123 square feet of building area. They are located a distance of .10 to 1.6 miles from the subject. Comparables #1, #2 and #3 sold from April 2014 to August 2015 for prices ranging from \$760,000 to \$914,000 or from \$161.09 to \$187.49 per square foot of living area including land. Comparable #4 has an asking price of \$1,699,000 or \$237.19 per square foot of living area including land.

Based on this evidence, the board of review requested confirmation of the subject's assessment.

In rebuttal, the appellant's counsel compares and contrasts the comparables submitted by both parties.

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

The appellant submitted an appraisal estimating the subject property had a market value of \$740,000 or \$146.68 per square foot of living area as of January 1, 2015. The Board gave little weight to the appraisal report. The appraiser explained in the appraisal he made adjustments for site using the assessor's 2015 land value and not market value. This undermines the credibility of the appraisal report. Instead, the Board will analyze the raw sales submitted by both parties.

Less weight was given to appellant's comparables #1, #3, #4, and #5 and board of review comparables #1, #2, and #4 based on date of sale, location and/or dwelling size. Although none of the comparables submitted by either party closely match the subject in all characteristics, the

Board finds the best evidence of market value in the record to be comparable #2 submitted the appellant and comparable #3 submitted by the board of review. Although their lot sizes were smaller than the subject, these comparables were most similar to the subject in location, age, style, dwelling size and most features. These comparables sold in October and April 2014 for unadjusted sale prices of \$740,000 and \$914,000 or for \$149.40 and \$187.49 per square foot of living area, respectively. The subject's assessment reflects an estimated market value of \$837,963 or \$166.10 per square foot of living area which is within the range established by the most similar comparable sales in the record on both a total market value basis as well as a square foot basis. Based on this evidence, the Board finds the subject's assessment is supported and no reduction in the subject's assessment is warranted.

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



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: July 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.