



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

APPELLANT: AH4RPF0UR LLC  
DOCKET NO.: 16-02877.001-R-1  
PARCEL NO.: 07-02-204-020

The parties of record before the Property Tax Appeal Board are AH4RPF0UR LLC, the appellant, by attorney Michael R. Davies, of the Law Offices of Michael R. Davies, Ltd. in Oak Lawn; 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:** \$13,570  
**IMPR.:** \$64,499  
**TOTAL:** \$78,069

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 2016 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 2,076 square feet of living area. The dwelling was constructed in 1994. Features of the home include a full unfinished basement, central air conditioning, a fireplace and an attached 484 square-foot garage. The property has an 11,774 square-foot site and is located in Waukegan, Warren Township, Lake County.

The appellant submitted evidence before the Property Tax Appeal Board claiming overvaluation as the basis of the appeal. In support of the overvaluation claim, the appellant submitted limited descriptive information for 12 comparable sales.<sup>1</sup> However, comparable #1 was the subject

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<sup>1</sup> The Board requested the appellant to complete the grid analysis in Section V of the appeal petition. The appellant failed to comply with the Board's request. The appellant failed to disclose the comparables' exterior construction,

property. The 11 properties have from 5,227 to 43,560 square feet of land area and are located from 0.05 to 0.75 of a mile from the subject. The comparables were improved with one or two-story dwellings that were built from 1977 to 1999. The dwellings ranged in size from 1,772 to 2,269 square feet of living area. The comparables were reported to have three bedrooms and two or three bathrooms. The appellant failed to disclose the comparables' exterior construction, foundation type or features such as central air conditioning, fireplaces or garages. The comparables sold from December 2012 to November 2015 for prices ranging from \$158,000 to \$232,500 or from \$82.72 to \$113.76 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 \$78,069. The subject's assessment reflects an estimated market value of \$235,431 or \$113.41 per square foot of living area including land when applying the 2016 three-year average median level of assessment for Lake County of 33.16%.

The board of review presented a grid analysis with information on three comparable properties. One of the comparables has the same neighborhood code as the subject. The properties have from 7,440 to 12,707 square feet of land area and are located from 0.197 to 0.959 of a mile from the subject. The comparables are improved with two-story dwellings of frame construction. The dwellings were constructed from 1986 to 1994 and have from 1,862 to 2,294 square feet of living area. The comparables have partial basements with finished area, central air conditioning, a fireplace and garages that range in size from 441 to 840 square feet of building area. The comparables sold from July 2015 to April 2016 for prices ranging from \$225,000 to \$273,000 or from \$111.81 to \$120.84 per square foot of living area, land included. As part of the submission, the board of review provided the property record cards, schematic drawings and photographic evidence for the subject and the comparable properties. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **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.

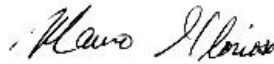
In this appeal, the Board considered 14 comparable sales presented by the parties. The Board gave less weight to the appellant's comparables #3 and #6 through #12. The appellant's comparable #8 received less weight, because it was significantly older than the subject. The appellant's comparables #3, #6, #7 and #9 through #12 sold from December 2012 to October 2014 and were considered to be dated in relation to the January 1, 2016 assessment date.

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foundation type and features such as central air conditioning, fireplaces or garages. In addition, the appellant provided only ranges for lot size, story height and number of bathrooms and bedrooms.

The Board gave more weight to the board of review's three comparable sales and the appellant's comparables #2, #4 and #5, despite the lack of information regarding the appellant's characteristics. The board of review comparables and the appellant's comparables #2, #4 and #5 were generally similar to the subject in location, age and living area, and they sold more proximate to the January 1, 2016 assessment date. These properties sold from May 2015 to April 2016 for prices ranging from \$190,000 to \$273,000 or from \$96.46 to \$120.84 per square foot of living area, including land. The subject's assessment reflects a market value of \$235,431 or \$113.41 per square foot of living area including land, which is within the range established by the best comparable sales in this record. Based on this record, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and 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. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



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: August 21, 2018



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 or years of the same general assessment period, as provided in Sections 9-125 through 9-225, 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 such subsequent year or years 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 OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

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.

PARTIES OF RECORD

AGENCY

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APPELLANT

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